

Planning Statement

Clay Lane

Shaw Energi

July 2023

Turley

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1. Introduction

- 1.1 This Planning Statement has been prepared by Turley on behalf of Shaw Energi Ltd (collectively 'the Applicant') to accompany a full planning application for a battery energy storage system ("BESS") (the 'Proposed Development') on at Land bounded by The Rake, Lower Jowkin Lane and Furbarn Road, Rochdale ('the Site').
- 1.2 This statement is intended to assist Rochdale Borough Council ('RBC' or 'the Council') as the Local Planning Authority ('LPA') in determining this application, by providing an evaluation of the Proposed Development against relevant planning considerations. Having regard to Section 38(6) of the Planning and Compulsory Purchase Act 2004, this statement considers the conformity of the Proposed Development with the Local Development Plan and the weight to be applied to other material planning considerations.

Site Context

- 1.3 The proposed application site ("the Site") is located approx. 600m to the north west of Bamford and around 3.8km west of Rochdale, with the A680 located approx. 1km to the north. The site comprises an open field, with the red line boundary measuring a total of around 0.94 hectares (ha), as identified on the accompanying Site Location Plan in **Appendix 1**. The proposed energy development Site extends to approximately 0.69 ha and slopes southwards from the junction of The Rake and Furbarn Road. The proposed route of underground 33kV cable which runs along Furbarn Road extends to approximately 0.25 ha.
- 1.4 The Site is bounded to the north by The Rake, to the west and south by Lower Jowkin Lane and to the east by Furbarn Road. Overhead powerlines traverse the western tip of the site on a north western to south eastern alignment.
- 1.5 The Site is located 0.3km to the south of the National Grid Substation at Clay Lane. The applicant is in possession of a formal offer to connect the proposed development to this facility.
- 1.6 Within the adopted RBC Development Plan, the Rochdale Core Strategy (2016), the Site is identified as forming part of the Green Belt (Policy G4).

Context and Need for Development (An Overview)

- 1.7 The UK Government has a legal obligation to achieve at least a 100% reduction in greenhouse gas emissions, compared to 1990 levels, by 2050 ("net zero"). The pathway to net zero includes an interim target of a 78% reduction in greenhouse gas emissions (compared to 1990 levels) by 2035.
- 1.8 The National Planning Policy Framework (NPPF) confirms that the provision of low carbon energy is central to the economic, social and environmental dimensions of

sustainable development¹. It is also critical to the realisation of climate change objectives. The provision of greater levels of renewable and local carbon energy infrastructure is, however, required to be supported by facilities for energy storage.

- 1.9 The Government's Energy White Paper (EWP)², the Draft National Policy Statement EN1 and a range of other Governmental and industry-led publications articulate the need for and provide strong support for the development of battery energy storage systems.
- 1.10 National Grid's Future Energy Scenarios Report (2022)³ confirms that there is currently 13GW of energy storage capacity within the UK. Many of the storage facilities currently deployed provide storage over a period of hours. However, these existing storage facilities cannot cost effectively cover prolonged periods of low output from solar and wind⁴. Consequently, storage capacity needs to increase to at least 20GW by 2030, in order to meet the Government's stated objectives regarding "net-zero" and the associated legal obligations.
- 1.11 This importance of and need for BESS to meeting net-zero obligations and facilitating the increased use of renewable energy resources has also been recognised in a number of recent appeal decisions, whereupon considerations of need have been awarded very significant weight in the planning balance⁵.
- 1.12 BESS are thus an essential component in meeting climate change objectives, reducing the costs of electricity and in increasing levels of national energy security.
- 1.13 By absorbing extra energy, storing it, and releasing it onto the network when the grid needs it during periods of peak demand, the construction of BESS enables the local grid network to run more effectively. When there is insufficient power during periods of high demand, batteries are discharged to balance under frequency preventing black and brown outs.
- 1.14 To balance over frequency, the batteries are charged to prevent dangerous spikes across the electricity infrastructure. This is crucial given the potential of short- to medium-term gas shortages, which might interfere with residential electrical supply. Battery storage facilities therefore provide a valuable service to both the National and Local Distribution Grid.
- 1.15 Battery storage facilities also play a fundamental role in decentralising the grid system, enabling power to be generated and stored in specific localised areas where it is required. Increasing the amount of operational storage developments reduces the over-dependence on centralised, fossil-fuel facilities, which in turn has a cumulative

¹ National Planning Policy Framework - 14. Meeting the challenge of climate change, flooding and coastal change - Guidance - GOV.UK (www.gov.uk)

² Energy white paper: Powering our net zero future - GOV.UK (www.gov.uk)

³ Future Energy Scenarios (July 2022) National Grid ESO

⁴ Draft NPS EN1 (para 3.3.26)

⁵ Appeal reference APP/N2739/W/22/3300623 (Rawfield Lane, Fairburn, Selby); APP/H1705/W/21/3289603 (Minchens Lane, Bramley); APP/D1265/W/22/3300299 (Land at Park Farm Gillingham); APP/C3430/W/22/3292837 (Land west of Wolverhampton Primary Substation); APP/N1730/W/17/3167123 (Little Holt Lane, Hook); APP/M2325/W/18/3196360

effect on reducing CO2 emissions and de-carbonising the grid. Decentralisation is key in increasing efficient energy generation, with less reliance on centralised facilities to overproduce in operation to account for transmission loss over greater distances.

- 1.16 Battery storage schemes also allow more renewable energy production to be integrated into the system. As renewables produce a variable supply of electricity production in peaks and troughs, battery storage facilities allow for this, being able to respond at short notice to requests from National Grid to generate electricity, when renewable sources are not generating.

The Proposed Development

- 1.17 The description of development is as follows:

“Construction, management and operation of a Battery Energy Storage System (BESS) with associated infrastructure (comprising an underground cable connection to a National Grid Substation, temporary construction access from The Rake, vehicular access for maintenance vehicles from Lower Jowkin Lane, security fencing, lighting and CCTV provision) and associated landscaping works.”

- 1.18 The proposed development comprises a BESS of 57MW. The facility will consist of battery storage containers, transformers, invertors, switch rooms and control rooms, drainage, landscaping, and ancillary equipment. A proportion of the battery storage containers and inverters will be accommodated within barn-like structures whilst a proportion will be located externally.
- 1.19 A new 132kV substation will be installed on the Site which, in turn, will connect the Proposed development to the National Grid substation located at Clay Lane, northwest of the development.
- 1.20 A temporary access from The Rake and temporary road through the Site will be provided for the duration of the construction period with the land reinstated and landscape thereafter.
- 1.21 Full planning permission is sought for the proposed development for a temporary period of 30 years. The Site would be decommissioned after this period and returned to its existing use.

Statement Structure

- 1.22 The remainder of this Planning Statement is structured as follows:

- **Section 2:** a description of the Site and its surroundings.
- **Section 3:** a summary of the pre-application engagement undertaken with Rochdale Borough Council.
- **Section 3:** a description of the Proposed Development.

- **Section 4:** a summary of the development plan and relevant national planning policies against which the development proposals should be assessed.
- **Section 5:** a review of the extent and degree of harm which would be caused to the Green Belt as a consequence of the Proposed Development.
- **Section 6:** an overall assessment of harm to the Green Belt and other hams as a consequence of the Proposed Development.
- **Section 6:** a summary of the case for the Proposed Development identifying how it performs against the development plan and other material considerations.
- **Section 7:** the summary and conclusion to this statement.

2. Site and Surroundings

- 2.1 This chapter provides a description of the Site context (as a whole) and the surrounding area.

The Site and Surrounding Area

- 2.2 The Site is situated within the jurisdiction of Rochdale Metropolitan Council, approximately 4km to the west of Rochdale Town Centre and 900m north east of Bamford and outside the settlement boundary.
- 2.3 The location and extent of the Site is identified by the Site Location Plan provided at **Appendix 1**.
- 2.4 The proposed energy development Site extends to approximately 0.69 hectares with overhead powerlines traversing the western tip of the Site on a north western to south eastern alignment. The Site is bounded to the north by Rake Lane, to the west and south by Lower Jowkin Lane and to the east by Furbarn Road. The proposed route of underground 33kV cable which runs along Furbarn Road extends to approximately 0.25 hectares
- 2.5 The Site is of undulating topography generally sloping down from the junction of The Rake / Furbarn Road.

Figure 2.1: Wider context of the Site



- 2.6 The surrounding area is primarily agricultural, with cultivated fields and grazing land to the north, south and east of the Site. Ashworth Cattery (Waterloo Farm) is located directly to the west, between the development and Jowkins Wood. There are no other residential dwellings within the immediate vicinity of the Site.
- 2.7 In the wider context Naden Brook is located c.150m to the west, woodland blocks c.200m to the west, and a series of small rural residential and agricultural buildings to the south of the Site.
- 2.8 The A680 which connects Edenfield to Rochdale is approximately 1km north from the Site. The B6222 is located approximately 1.3km to the south and connects Rochdale to Bury.

Designations and Planning Context

- 2.9 The Site is identified within adopted RBC Development Plan, the Local Plan (Adopted 2016) as forming part of the Green Belt (Policy G4).
- 2.10 The Green Belt boundary in this area is proposed to be modified by the draft Greater Manchester Places for Everyone Plan which has been the subject of Public Examination. Whilst the application Site would remain in the Green Belt, land to the south is proposed to be removed and allocated for residential development (Policy G4). This amendment would have the effect of placing the application Site on the immediate edge of the urban area.
- 2.11 The Site is not subject to any statutory or non-statutory designations or assets that relate to biodiversity, landscape, and heritage. The closest being the River Blythe Site of Special Scientific Interest (SSSI) which lies approximately 400m south. There are two Ancient Woodland's in close proximity to the Site, Naden Brook Wood which is located approximately 160m to the north east and Jowkin Wood which is located approximately 228m to the south west.
- 2.12 Located approximately 240m to the north west is the Ashworth Valley which traverses on a north south alignment. This valley follows the Naden Brook and is a well-vegetated green corridor.
- 2.13 There are no Listed Buildings or Conservation Areas in the vicinity of the Site. Listed Buildings in the wider surrounding area, including:
- Church of Saint James – Grade II c. 650m to the north west.
 - Egerton Arms – Grade II c. 670m to the north west.
 - Manor Farmhouse – Grade II c. 780m to the north.
 - Ashworth Hall – Grade II c. 620m to the south west.
 - Bamford United Reformed Church – Grade II c.920m to the south.

- 2.14 Scott House (formerly known as Memorial Home for Crippled Children) is located c.210m to the north east and is recorded on the local Historic Environment Record (HER).
- 2.15 The Environment Agency's Flood Map for Planning indicates that the Site is located within Flood Zone 1 which means there is a less than 1 in 1,000 annual probability of river or sea flooding.

Planning History

- 2.16 The Applicant previously submitted an application⁶ on 1 September 2022 on the same site for:

'Siting of containerised battery storage units, new sub-station and ancillary equipment including engineering works to infill existing pond, changes to levels including formation of retaining wall, formation of new access together with 2.5m high palisade fence and gates at Land off Lower Jowkin Lane and 132kV compound at Clay Lane Power Station'

- 2.17 This application was withdrawn on 17 November 2022 following a review of comments from RBC with the intention to resubmit a revised scheme which takes into consideration the points raised on the previous application.

⁶ Application reference number 22/00946/FUL

3. Proposed Development

3.1 The Proposed Development comprises a battery storage facility of 57MW. The proposed energy development Site extends to approximately 0.69 hectares and the proposed route of underground 33kV cable which runs along Furbarn Road extends to approximately 0.25 hectares.

3.2 The formal description of development is as follows:

“Construction, management and operation of a Battery Energy Storage System (BESS) with associated infrastructure (comprising an underground cable connection to a National Grid Substation, temporary construction access from The Rake, vehicular access for maintenance vehicles from Lower Jowkin Lane, security fencing, lighting and CCTV provision) and associated landscaping works.”

3.3 The proposed BESS will be sufficient to provide electricity to approximately 20,000 homes for up to 2 hours.

3.4 BESS has been classified as a form of energy generation⁷.

3.5 It will assist the Government in meeting its legal obligations in relation to achieving a 100% reduction in greenhouse gas emissions compared to 1990 levels by 2050⁸. It will also assist in ensuring enhanced levels of national energy security.

3.6 The Proposed Development is one of a number of large-scale BESS projects to have been promoted through the Town and Country Planning Act following publication of The Infrastructure Planning (Electricity Storage Facilities) Order which redefined electricity storage in the Planning Act 2008 to allow proposals over 50MW in England to be determined at a local level rather than through the Nationally Significant Infrastructure Project (NSIP) process. In announcing the legislative change, the Minister for Business Energy and Industry Strategy (BEIS) confirmed that the change would:

“unlock investment in larger storage projects, support low carbon jobs and help to decarbonise our energy system..... [and that this was] critical to the net zero strategy which we [the Government] have set ourselves”.

3.7 A summary of the Proposed Development is provided below, with further details also contained within the accompanying technical reports.

Connection to the National Grid

3.8 The proposed battery storage facility will be connected to the National Grid via the proposed underground cable connection route (see drawing reference. 4130-P-507 Cable Route, Phasing & Trench Details for further information).

⁷ Letters from Chief Planner in England (December 2016) and Ofgem (2020)

⁸ The Climate Change Act 2008 (2050 Target Amendment) Order 2019

- 3.9 The connecting cable will be laid in trenches approximately 1.1 metres wide and 1.1metres deep both within the Site and within Furbarn Road.

Main Development Components

- 3.10 The main components of the Proposed Development once completed will comprise the following:
- 2 no. “barn structures” to house battery units and invertors
 - 15 no. powerpack battery units
 - 8 no. invertors
 - 1 no. ancillary unit
 - 1 no. substation building
 - Vehicular access from Lower Jowkin Lane
 - 2.5m high green mesh security gates and fencing
 - Access track for maintenance vehicles
 - Areas of new landscape planting.
- 3.11 Formation of the Proposed Development will require some manipulation of existing ground levels due to the prevailing topography of the Site. Existing and proposed Site levels are shown within drawings 4130-P-502 and 4130-P-503-RevA.
- 3.12 Construction of the Proposed Development will necessitate the formation of a temporary vehicular access from The Rake and the construction of a temporary ‘haul’ road. Both features would be removed from site and land reinstated upon completion of construction activity.
- 3.13 The Proposed Development is intended to be provided as a 2-hour system with an installed capacity of 57MW and export capacity of 57MW.

Site Layout

3.14 The layout of the Proposed Development is shown at **Figure 3.1** below.

Figure 3.1: Proposed Site Plan (drawing reference 4130-P-503-RevA)



3.15 The Design and Access Statement and Landscape Strategy document submitted within the application provides further information as to core design principles, the factors which have influenced the proposed site layout and the iterative process which has been followed.

3.16 The overarching design objective has been to:

- Minimise the footprint of the development in so far as is operationally possible;
- Minimise the visibility of the battery storage containers, inverters and ancillary unit through careful siting of infrastructure, manipulation of ground levels and the incorporation of barn-like structures within the scheme to house a proportion of the battery storage infrastructure; and
- Introduce new landscaping planting in key locations in the form of hedgerows, trees and grassland to reinforce the rural lane characteristic of adjoining lanes, to screen the development from views outside the Site and to deliver a net gain to biodiversity. A mix of both evergreen and deciduous species has been incorporated to provide year-round interest and screening benefits.

Containerised Battery Units, Inverters and Ancillary Equipment

- 3.17 The containerised battery units, inverter units and ancillary equipment mounted upon a steel skid frame with galvanised grate metal decking. The skid frames would have a height of 0.6metres.
- 3.18 The containerised battery units, inverters and ancillary equipment will be finished in recessed colours (grey – RAL7035) and have individual heights of:
- Battery units – 2.4m
 - Inverters – 2.27m
 - Ancillary equipment – 2.35m.

Barn Structures

- 3.19 A proportion of the battery storage units and inverters will be housed under two barn structures, each with an overall footprint of 300m² and a maximum height of 5.15 metres.
- 3.20 Each of the barns would have a pitched corrugated metal sheet roof which would be finished externally in a moss-green powder coating. The barns would be treated with close-boarded timber cladding with 150mm wide planks in a natural finish and the exposed steelwork, box-section gutters and rainwater pipes will be painted in anthracite grey in order to provide an agricultural aesthetic.
- 3.21 Barn structures are a common feature within the agricultural landscape and their incorporation within the scheme would assist in screening the battery storage units and inverter units both visually in views from the east and south. Details can be seen in drawing reference 4130-P-506.

Access Roads

- 3.22 For maintenance of the facility there will be a short internal road which will allow space for a 3.5t panel van to park and a turning area so vehicles can exit the same way they came. This will be accessed from Lower Jowkin Lane (see dwg ref. 083237-CUR-XX-00-D-TP-05008).
- 3.23 The access road will be generally of 3m width, increasing to 9m where necessary to allow for the circulation of maintenance vehicles. Within the compound, all areas will be surfaced with a hardcore stone, other than the new access road, which will be surfaced with permeable loose stone chippings.

Fencing

- 3.24 In order to provide the necessary security to the Site a 2.5 metres high polyester powder-coated 'V' mesh security fencing panels which would be constructed around the perimeter of the compound. The panels will have matching 60 x 60mm posts at 3m centres and it is anticipated that the fencing will be colour coated to RAL 6005 (Moss Green). A secure gated entrance would be provided off Lower Jowkin Lane, this will be similarly constructed. Security lighting and CCTV facilities are also proposed with details of these to be controlled through planning condition.

Landscaping and Biodiversity Net Gain

- 3.25 The Proposed Development would retain the most important landscape features within the site: the existing line of trees, hedgerows and scrub along the perimeter of the Site. Retention will maintain and enhance existing levels of visual containment. Appropriate root protection zones will be established as is confirmed within the Arboriculture Impact Assessment.
- 3.26 A Landscape and Planting Strategy (dated June 2023) has been prepared by Turley Design. This provides a detailed description of the comprehensive and high-quality landscaping proposed across the Site. A summary of the key elements of proposed landscaping is provided below:
- Existing trees, hedgerows and scrub along the field boundaries to be retained to maintain existing levels of visual containment;
 - Existing hedgerow structure will be improved to increase existing levels of visual containment and provide enhanced green infrastructure connections;
 - A native woodland block to be planted between the battery/inverter units and the overhead powerline easement to provide further visual screening and help assimilate the proposals into the wider landscape pattern;
 - Where site levels require the use of retaining walls a Flex MSE Vegetated Wall System (or similar product) will be established to establish green vertical faces. The retaining walls will be planted with a mix of ferns, grasses and small shrubs which collectively grow less than 1.5m in height;
 - Individual tree planting along Lower Jowkin Lane, Furbarn Road and Rake Lane will provide additional screening benefits and enhance the rural lane characteristics;
 - Certain battery storage and inverter units will be housed within two small timber barn structures. These will be located at the lower parts of the Site to ensure they are not visually prominent in the wider landscape setting. Elevations to be 'hit and miss' timber with metal sheet roofing to reflect barn structure and material in the area; and
 - Battery storage and inverter units to be arranged in a linear formation to work with the topography of the site, ensuring the height of the units does not sit above the northern hedgerow, and to retain visual permeability through the site. Where possible, all equipment will be designed using recessive colours to reduce visual prominence.
- 3.27 Alongside the landscape proposals the application seeks to deliver a net gain to biodiversity. The following features have been carefully embedded into the design to enhance the biodiversity on the Site:
- A high proportion of native species to contribute to and improve the biodiversity value of the Site through the selection of wildlife friendly species which provide opportunities for foraging, nesting and shelter;

- The provision of bird and bat boxes on retained trees for roosting and nesting opportunities; and
- The provision of log, brash and stone piles to be placed in both sunny and shady locations to provide refuge and hibernation habitats for invertebrates, amphibians, and reptiles.

Drainage

- 3.28 The Site is located in Flood Zone 1 and is therefore at the lowest risk of flooding.
- 3.29 Currently, the Site relies on natural drainage, and the proposed plans aim to maintain this approach, avoiding any new connections to the mains surface water system. There is no history of flooding issues on the site. All new roadways and stone surfaces within the site will be designed to be fully permeable.
- 3.30 Rainwater collected on the new pitched roof barn structures will be directed to the ground level through rainwater pipes and allowed to naturally soak away. The floor inside the barn structures will be made of permeable stone, rather than a concrete slab.
- 3.31 Any rainwater that comes into contact with the top of the battery units, inverters, substation, or ancillary unit will simply fall to the ground and naturally permeate through the permeable surfaces.
- 3.32 The proposed project will not produce any foul waste, eliminating the need for foul drainage connections on the site.

Construction, Operation and Decommissioning

- 3.33 It is anticipated that construction of the Proposed Development would take c. 12 months. The broad sequence of construction activity would be as follows:
- Site surveys
 - Earthwork for foundations/access/cable runs
 - Balance of plant and temporary site equipment
 - Major equipment delivery
 - Assembly of major equipment
 - Installation of supporting equipment
 - Testing and commissioning
- 3.34 It is anticipated that there will be a total of 25 HGVs delivering the battery powerpacks, inverters and ancillaries to the site. All vehicular movements will be managed across the build sequence to minimise arrivals and departures at the same time. It is anticipated that construction activity will avoid sensitive time periods such as weekends and peak periods. Full traffic management plans and risk assessment

methodologies will be agreed with Rochdale Highways prior to construction via an appropriate condition.

- 3.35 A temporary vehicle access for construction vehicles will be provided on Rake Lane in the north east of the Site. This will be surfaced with loose stone and removed upon completion of construction activity with the land planted to grassland mix as described above, with additional trees and hedgerows.
- 3.36 The temporary construction access and turning head will be safe and feasible for a 10m rigid HGV (see dwg ref. 083237-CUR-XX-00-D-TP-05006). No vehicles larger than this will be used to access the site during construction.
- 3.37 Following completion of the project, the temporary access will be removed, and the ground reinstated along the internal route
- 3.38 As part of the on-site construction, it will be necessary to lay a new underground 33kV cable between the site and Rochdale Power Station (see dwg ref. 4130-P-507). To minimise the impact on existing residential properties, phasing of the works or utilisation of no dig technologies are being considered. The cable route will be laid underground along Furbarn Road. Full details of the cable phasing can be conditioned via a Construction Management Plan.
- 3.39 Once the development is constructed, the facility will be in continuous operation. It will be monitored remotely. Maintenance visits will be made on a monthly basis utilising a 3.5t panel van.
- 3.40 Planning permission is sought for a temporary period of 30 years after which the batteries and associated infrastructure will be removed from the site and the land returned to agricultural use. A decommissioning method statement and site restoration strategy will be prepared and submitted to the local planning authority for approval prior to decommissioning activities commencing. This can be secured by planning condition.

4. Planning Policy Considerations

- 4.1 This section of the statement identifies the relevant policy context and therefore the decision-making framework that applies in determining the application.
- 4.2 Section 38A of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 require applications for planning permission to be submitted to the Local Planning Authority and determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.3 In this case the Development Plan comprises the Rochdale Adopted Core Strategy (October 2016) ('CS').
- 4.4 Other material planning policy considerations including the National Planning Policy Framework (NPPF) (July 2021), National Planning Practice Guidance (NPPG), relevant Energy Guidance documents, and Supplementary Planning Documents and Guidance (SPDs / SPGs) where they do not form part of the Development Plan.
- 4.5 The draft National Policy Statements EN-1 and EN-3 are also relevant material considerations as are the various strategies issued by the Government relating to the decarbonisation of the economy, addressing climate change objectives, and ensuring enhanced levels of national energy security. These include the Energy White Paper (2020) and Net Zero Strategy (2021).
- 4.6 The following represents a detailed account of the key planning policies from the Development Plan and other material planning policy considerations of relevance.

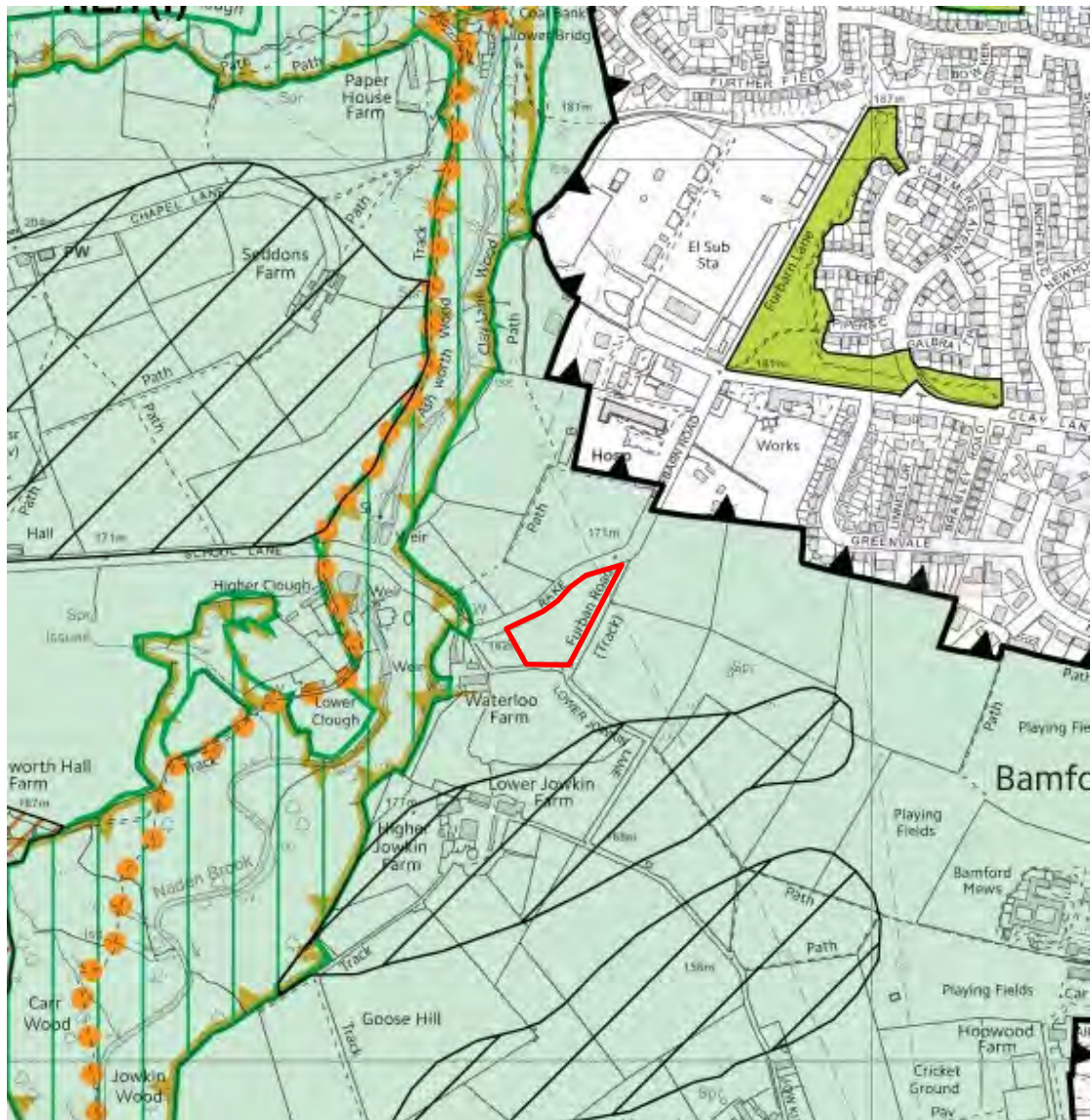
Development Plan

- 4.7 The adopted Development Plan comprises:
- Rochdale Borough Local Plan (adopted 2016) ('CS')
 - Rochdale Borough Unitary Development Plan and Policies (UDP) (adopted 2006)
 - Greater Manchester Joint Minerals Plan (April 2013) ('GMMP')

Site specific designations

- 4.8 An extract of the Unitary Development Plan and Policies (adopted 2006) map is provided at Figure 4.1 below. It identifies key land use designations from the UDP which are applicable to the Site.

Figure 4.1: Rochdale Unitary Development Plan and Policies map extract (site outlined in red)

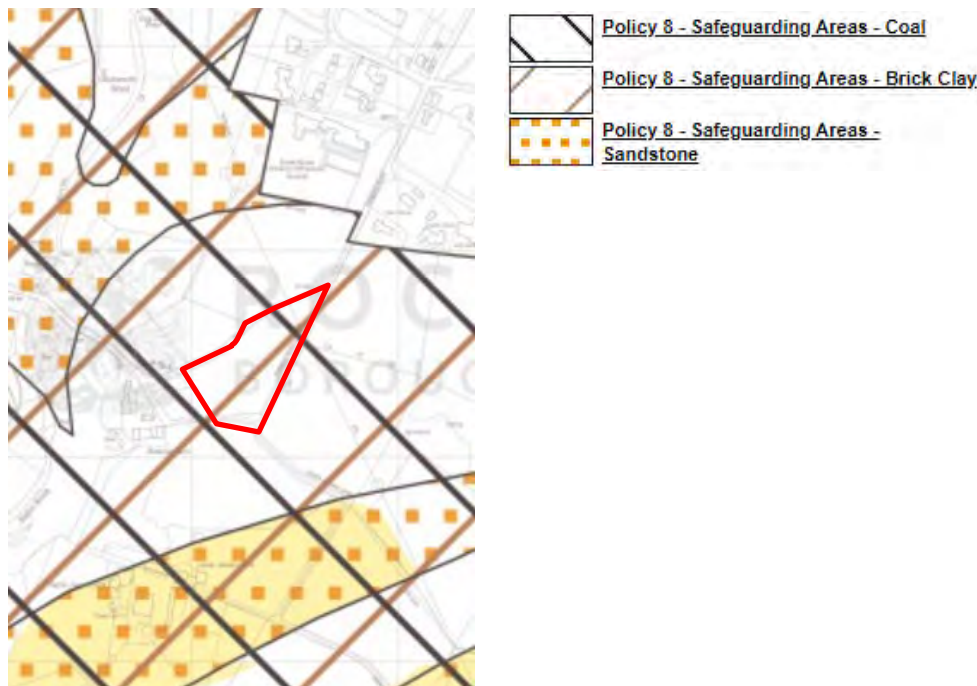


- 4.9 The Site is designated as land within the Green Belt boundary (**Policy G/D/2**), as defined on the UDP proposals map. The fundamental aim is preventing urban sprawl by strictly controlling development, where a general presumption is made against built development unless it falls within specific categories that will not prejudice the purposes and objectives of the Green Belt.
- 4.10 **Policy D/4** seeks to control development in the Green Belt and confirms that inappropriate development will not be granted except in very special circumstances
- 4.11 In line with national policy, development of buildings will be considered appropriate if it is for the following purposes:
- (a) *agriculture and forestry;*

- (b) *essential facilities for outdoor sport and outdoor recreation, for cemeteries and other uses which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it;*
 - (c) *the limited extension, alteration, or replacement of an existing dwelling in accordance with **UDP Policies D/7 and D/8**; and*
 - (d) *limited infilling or redevelopment of major, existing developed sites identified under, and in accordance with, **UDP Policy D/5**.*
- 4.12 The Site is designated as Green Belt within the **CS Policy G4**. The policy seeks to prevent urban sprawl beyond the existing settlement boundaries by controlling development, whereby a general presumption is made against built development unless it falls within specific categories that will not prejudice the purposes and objectives of the Green Belt.
- 4.13 **CS Policy G4** confirms that inappropriate development in the Green Belt will only be allowed in 'Very Special Circumstances' ('VSC'), which will not exist unless the harm to Green Belt by way of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 4.14 **UDP Policy RE/3** states that development will not be permitted if it will result in the loss of the best and most versatile agricultural land (Grade 3a or above) unless it can be demonstrated that:
- There is an overriding need for the development which can be demonstrated;
 - The land does not have a recognised environmental designation; and
 - The development is proposed on land of the lowest practical grade.
- 4.15 The Greater Manchester Joint Minerals Development Plan Document was formally adopted in April 2013. Among other things, it seeks to protect local environments from landscape harm resulting from mineral extraction and protect minerals infrastructure to provide an adequate supply of minerals to meet Greater Manchester's needs. It designates the Site as a Mineral Safeguarding Area for Coal, Brick Clay and Sandstone (**Figure 4.2**)
- 4.16 **Policy 8** 'Prior Extraction of Mineral Resources' sets out the criteria for non-mineral development within an area designation as a Mineral Safeguarding Area. It states that proposals will only be permitted where:
- (i) *"The need for the development outweighs the need to extract the mineral;
or*
 - (ii) *It can be clearly demonstrated that it is not environmentally acceptable or economically viable to extract the mineral prior to non-mineral development taking place; or;*

- (iii) *It can be clearly demonstrated that the mineral is either not present or of no economic value or too deep to extract in relation to the proposed development; or;*
- (iv) *The development is limited or temporary and would not prevent minerals extraction taking place in the future."*

Figure 4.2: Greater Manchester Joint Minerals Plan map extract (site outlined in red)



Adjacent site-specific designations

- 4.17 The boundary of the urban area is defined on the UDP proposals map and identifies that the Site is south and west of the urban area. **UDP Policy G/D/1** seeks to ensure that new development is concentrated within the urban area to strengthen urban regeneration and protect the countryside.
- 4.18 Approximately 200m to the west is a designated Recreational Rights of Way (**UDP Policy RE/6**), the policy seeks to secure the protection, development and improvement of these routes to link areas of managed and accessible countryside.
- 4.19 Approximately 240m to the north east of the Site, the land is a protected recreational open space. **UDP Policy G/3** seeks to protect the land from development unless the exceptions listed in the policy apply.
- 4.20 Further to this, approximately 22m to the west of the Site, the land is a designated site of ecological and geological/geomorphological importance. **UDP Policy NE/2** states that development proposals adversely affecting sites and areas of ecological and geological/geomorphological importance will not be permitted.

- 4.21 Located c.240m to the north west is the Ashworth Valley, **UDP Policy RE/7** seeks to ensure that outdoor recreational uses will be promoted in this area and that such uses should not be detrimental to the amenity or character of the area.

Climate Change

- 4.22 The CS places a high priority on minimising the impact of new development on climate change so that the borough can fulfil its obligation to meet national goals. As stated in **CS Policy G1**, in order to combat climate change, the Council aims to encourage and promote the development of renewable energy sources that will not, due to their size, location, construction, or operation, harm the local area, its character, environmental assets in a way that is unable to be appropriately mitigated.
- 4.23 Through siting, orientation, layout, and landscaping, new developments must achieve the greatest reduction in energy demand. Green walls should be incorporated into developments whenever it is practical, in accordance with **CS Policy G2**.
- 4.24 The Council will promote renewable and zero carbon energy generating developments to help meeting CO2 reduction targets and contribute towards energy security for Greater Manchester and the North West. **CS Policy G3** acknowledges that renewable energy developments play an important role in achieving the transition to a low carbon economy and associated reductions in carbon. Where developments can successfully minimise and mitigate significant harm they will be promoted and encouraged. Further to this, it is stated that all proposals should seek to minimise the length of cable connection in order to reduce the visual impact of structures located above ground.
- 4.25 As is noted in paragraph 3.3, BESS are recognised as a form of energy generation and is strategically important in facilitating the integration of greater levels of renewable energy generation into the electricity transmission and distribution network.

Design

- 4.26 The adopted development plan for the Borough contains a number of design-related policies which seek to ensure that new development improves the image of the Borough by requiring design which is of a high standard and helps to 'green' the urban environment (**CS Policy P1** and **UDP Policy G/BE/1**).
- 4.27 In accordance with **CS Policy P3** and **UDP Policy BE/2**, new development must adhere to high standards of design, including associated landscaping, regardless of its location.

Ecology

- 4.28 The borough of Rochdale contains a diverse range of habitats and features of nature conservation; therefore, the Council seeks to ensure that development proposals protect and enhance biodiversity, existing features such as ponds, wetlands, trees, hedges, meadows, flora and fauna, takes opportunities to promote biodiversity and create new habitats and improves access to new or existing biodiversity interest for public enjoyment (**CS Policy G7** and **UDP Policy G/NE/1**).
- 4.29 **CS Policy G1** states that new development will be expected to include an appropriate level of tree planting on or off site. Additionally, the CS seeks opportunities for new development to promote biodiversity and create new habitats through landscaping and construction features such as green walls (**CS Policy G6** and **G7**).

- 4.30 The CS seeks to ensure that new development does not increase CO2 emissions and addresses the impacts of climate change and adheres to the 'energy hierarchy' to the extent that this reflects national policy, targets, and requirements for that type of development (**CS Policy G1 and G2**).
- 4.31 Furthermore, the CS states that new development must not have any impacts that would lead to an unacceptable increase in air, water, noise, light, or other pollution and that any risks arising from contaminated land or land instability are identified prior to development taking place and appropriate actions to address these risks identified and undertaken (**CS Policy G9**).
- 4.32 The Climate Change Adaptation SPD (June 2012) and Biodiversity and Development SPD (January 2008) provides additional guidance to support these policies, which is expanded later in this chapter.

Heritage

- 4.33 **CS Policy P2** states that the Council will protect the Borough's heritage by conserving and enhancing heritage assets. The policy encourages the positive and intelligent use of heritage assets, whilst also prioritising the conservation of heritage assets at risk from decay.
- 4.34 Additionally, non-designated heritage assets must be preserved, and any new development will be expected to protect and, whenever feasible, enhance the natural landscape character (**CS Policy P2**). To do this, the policy outlines measures that can preserve the character of the environment when development takes place such as planting trees for screening and using dark colours on roofing and other surfaces that have a visual influence on the landscape.

Flooding and Drainage

- 4.35 **CS Policy G6** states that within urban areas there will be a focus on incorporating green infrastructure such as sustainable urban drainage systems (SUDS) into new development proposals. It is expected that development proposals affecting green infrastructure will have regard to local landscape character and contribute to its conservation or enhancement. The management of surface water and drainage through the use of on-site attenuation such as SUDS incorporated into landscaping an important consideration when determining development proposals (**CS Policy G8**).
- 4.36 The Council will ensure that all new development does not result in any form of increased flooding and require that proposals comply with a sequential approach in line with national policy (**CS Policy G8**).

National Planning Policy and Guidance

National Planning Policy Framework

- 4.37 The latest version of the National Planning Policy Framework ("NPPF") was adopted in 2012 and most recently updated in July 2021 and is a material consideration in the determination of all planning applications. Central to the NPPF is a 'presumption in favour of sustainable development' (Paragraph 11), with Paragraph 11c stating that development proposals which accord with an up-to-date Development Plan should be approved without delay.

- 4.38 Paragraph 8 of the NPPF sets out the Government’s key objectives for the delivery of sustainable development through three key pillars – economic, social and environmental objectives – which are interdependent and need to be pursued in mutually supportive ways.
- 4.39 The environmental objective of the NPPF actively supports low carbon energy and related development (Paragraph 8), providing support for *“mitigating and adapting to climate change, including moving to a low carbon economy”*, whilst the economic objective also seeks to *“ensure that sufficient land of the right type is available in the right places and at the right time to support growth [...] and by identifying and coordinating the provision of infrastructure”*. The social objective also seeks to *“support strong, vibrant and healthy communities [...] with accessible services [...] that reflect current and future needs and support communities’ health, social and cultural well-being”*.
- 4.40 Sustainable development should be delivered across thirteen key themes, of which the following are considered of relevance to the Proposed Development:
- Achieving sustainable development
 - Building a strong, competitive economy
 - Achieving well-designed places
 - Protecting Green Belt land
 - Meeting the challenge of climate change, flooding and coastal change
 - Conserving and enhancing the natural environment
 - Conserving and enhancing the historic environment
- Achieving sustainable development***
- 4.41 The purpose of the planning system is to *“...contribute to the achievement of sustainable development...”* (paragraph 7).
- 4.42 Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means as follows:
- “c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole...” (paragraph 11).

- 4.43 Footnote 7 of the Framework identifies the policies within the Framework which indicate where development should be restricted and where the presumption in favour of sustainable development may not therefore apply. The policies identified include land designated as Green Belt and designated heritage assets.

Building a strong, competitive economy

- 4.44 Paragraph 81 states that significant weight should be placed on the need to support economic growth and productivity, which involves the wider opportunities for development. More specifically to this application, paragraph 84 states that when looking to support a prosperous rural economy, planning decisions should enable *“...the development and diversification of agricultural and other land-based rural businesses”*.

Achieving well-designed places

- 4.45 This section outlines the Government’s guidance regarding good design and the great importance of a high-quality built environment. Paragraph 126 states that *“good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*

Protecting Green Belt land

- 4.46 The Framework attaches great importance to the Green Belt (paragraph 137). Paragraph 138 lists the five purposes of the Green Belt, which are to: *“(a) check the unrestricted sprawl of large built-up areas; (b) prevent neighbouring towns merging into one another; (c) assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*
- 4.47 Local planning authorities should, in general terms, regard the construction of new buildings in the Green Belt as inappropriate development, which is not to be approved except in very special circumstances (paragraph 147). Such circumstances will not exist unless the potential harm to the Green Belt – to which substantial weight should be attached – and any other harm resulting from the proposal is clearly outweighed by other considerations (paragraph 148).
- 4.48 Specific exceptions for the construction of new buildings in the Green Belt are also listed under seven distinct categories at Paragraph 149, whereby a proposed development falling within one of these categories would not be regarded as inappropriate development. Paragraph 150 also sets out certain other forms of development which are not inappropriate in the Green Belt, *“provided they preserve its openness and do not conflict with the purposes of including land within it”*. This includes engineering operations and some material changes of use of land.
- 4.49 Paragraph 151 states that *“When located in the Green Belt, elements of many renewable projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such*

very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources [emphasis added].

Meeting the challenge of climate change, flooding and coastal change

- 4.50 Chapter 14 of the Framework supports the supply of renewable and low carbon energy generation installations and associated infrastructure, stating that *“the planning system should support the transition to a low carbon future in a changing climate”* (Paragraph 152).
- 4.51 Paragraph 153 of the Framework adds that *“Plans should take a proactive approach to mitigating and adapting to climate change”*, with Paragraph 155 continuing that, in order to help increase the use and supply of renewable and low carbon energy and heat, Plans should *“identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems”*.
- 4.52 Paragraph 158 affirms that when determining applications for renewable and low carbon development, local planning authorities should *“not require applicants to demonstrate the overall need for renewable or low carbon energy and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions”*. Furthermore, local planning authorities should *“approve the application if its impacts are (or can be) acceptable”*.

Conserving and enhancing the natural environment

- 4.53 This chapter sets out the hierarchical approach to landscape protection. Paragraph 174 states that the planning system should *“contribute to and enhance the natural and local environment by:*
- () protecting and enhancing valued landscapes... (in a manner commensurate with their statutory status or identified quality in the development plan);*
 - (a) recognising the intrinsic character and beauty of the countryside; ...*
 - (b) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.”*
- 4.54 No specific guidance is provided on what constitutes a ‘valued landscape’. However, paragraph 175 states that *“Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries”*.
- 4.55 The Framework states that when determining planning applications, local planning authorities should encourage developments which provide *“opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate”* (paragraph 180).

- 4.56 The chapter states that *“planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the Site or the wider area to impacts that could arise from the development”* (paragraph 185). In doing so, planning policies and decisions should *“mitigate and reduce to a minimum potential adverse impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life”*.

Conserving and enhancing the historic environment

- 4.57 Chapter 16 of the Framework outlines the Government’s policy regarding the conservation and enhancement of the historic environment. Proposals should describe the significance of any heritage assets affected and any contribution made by their setting (paragraph 194). The level of detail should be proportionate to the asset’s importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 4.58 Paragraph 200 of the Framework confirms that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 4.59 Furthermore, Paragraph 203 states that *“the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”*.
- 4.60 Chapter 16 of the Framework further states that where a development proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 202).
- 4.61 In accordance with section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the LBCA Act), the decision-taker must have special regard to the desirability of preserving those listed buildings potentially affected by the proposals, or their settings or any features of special architectural or historic interest which they may possess.

National Planning Practice Guidance (NPPG)

- 4.62 The National Planning Practice Guidance (“NPPG”), last updated in August 2022, is a web-based resource that provides guidance relevant to the determination of this application. The NPPG’s principles and objectives are carried forward by Planning Practice Guidance (PPG), which also offers local authorities’ advice on the necessary elements upon which to base their judgments.
- 4.63 The NPPG covers a number of topics which are relevant to the determination of this application, including:
- “Renewable and Low Carbon Energy”

- “Climate Change”
- “Natural Environment”
- “Noise”

Renewable and Low Carbon Energy

- 4.64 Paragraph: 001 Reference ID: 5-001-20140306 (last revised 06/03/2014) states that *“increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse emissions to slow down climate change and stimulate investment in new jobs and businesses.” Additionally, it states that “planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.”*
- 4.65 Paragraph: 006 Reference ID: 5-006-20140306 (last revised 06/03/2014) notes that LPAs must take account of the technical considerations that affect renewable energy installations: *“Examples of the considerations for particular renewable energy technologies that can affect their siting include proximity of grid connection infrastructure and site size.”* Developers are also advised that *“the views of local communities likely to be affected should be listened to”*.
- 4.66 Paragraph: 004 Reference ID: 5-004-20140306 (last revised 06/03/2014) crucially states that there are no defined rules of how suitable areas for renewable energy should be identified, *“but in considering locations, LPA’s will need to ensure they take into account the requirements of the technology and, critically, the potential impacts on the local environment...”*. This adds that the views of local communities likely to be affected should also be listened to.
- 4.67 Paragraph: 013 Reference ID: 5-013-20150327 (last revised 27/03/2015) states that LPA’s also need to consider *“where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays.”*

Climate Change

- 4.68 Paragraph: 001 Reference ID: 6-001-20140306 (last revised 06/03/2014) states that local planning authorities should *“ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment”* and that *“there is a statutory duty on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts”*.

Natural Environment

- 4.69 Paragraph: 018 Reference ID: 8-018-20190721 (last revised 21/07/2019) notes that *“an ecological survey will be necessary in advance of a planning application if the type and location of development could have a significant impact on biodiversity and existing information is lacking or inadequate.”*

Noise

- 4.70 Paragraph: 005 Reference ID: 30-005-20190722 (last revised 22/07/2019) states that *“when noise is not perceived to be present, there is by definition no effect [...] the noise has no adverse effect so long as the exposure does not cause any change in behaviour, attitude or other physiological responses of those affected by it.”* Furthermore, it notes that *“the noise may slightly affect the acoustic character of an area but not to the extent there is a change in quality of life. If the noise exposure is at this level no specific measures are required to manage the acoustic environment.”*

Other Material Considerations

- 4.71 There are a range of additional documents related to climate change objectives and the production and utilisation of renewable and low carbon forms of energy. These include the following:
- The Climate Change Act 2008 (2050 Target Amendment) Order 2019.
 - National Infrastructure Commission: Smart Power (2016)
 - National Policy Statement EN-1 (2011)
 - The National Infrastructure Delivery Plan (2016)
 - The National Infrastructure Commission: Smart Power (2016)
 - The Committee on Climate Change: Net Zero, the UK’s Contribution to Stopping Global Warming (2016)
 - The Infrastructure Planning (Electricity Storage Facilities) Order (2020)
 - Energy White Paper: Powering our Net Zero Future (2020)
 - The Sixth Carbon Budget (2020)
 - Ten Point Plan for a Green Industrial Revolution (2020)
 - Energy White Paper: Powering our Net Zero Future (2020)
 - National Infrastructure Strategy: Fairer, Faster, Greener (2020)
 - The National Infrastructure Commission: Net Zero, Opportunities for the Power Sector (2020)
 - Draft National Policy Statement for Energy Infrastructure – EN-1 (2021)
 - Industrial Decarbonisation Strategy, BEIS (March 2021)
 - National Grid Future Energy Scenario Report, National Grid (July 2021)
 - Sixth Assessment Report, IPCC (August 2021)

- 4.72 The key messages and themes from this policy context are summarised below.

4.73 The United Kingdom became the first major economy in the world to pass laws to end its contribution to global warming by 2050 in June 2019 through the Climate Change Act 2008 (2050 Target Amendment) Order 2019⁹. The legislation requires the country to achieve net zero greenhouse gas emissions by 2050, compared to the previous target of an 80% reduction from 1990 levels. This target calls for a significant increase in renewable energy and the development of carbon capture and storage technology. Additionally, it requires the construction of new nuclear generation and a transition to hydrogen and electric for heating and transportation. The UK had already reduced emissions by 42% while growing the economy by 72% when the legislation was enacted.

4.74 The Overarching National Policy Statement for Energy (EN-1) ¹⁰ was published in July 2011, and though the targets are now out of date in the context of the Climate Change Act 2008 (2050 Target Amendment) Order 2019, it makes the following powerful statements:

- ⁹ [The Climate Change Act 2008 \(2050 Target Amendment\) Order 2019 \(legislation.gov.uk\)](#)

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- *“Paragraph 3.4.1 above sets out the UK commitments to sourcing 15% of energy from renewable sources by 2020. To hit this target, and to largely de-carbonise the power sector by 2030, it is necessary to bring forward new renewable electricity generating projects as soon as possible. The need for new renewable electricity generation projects is therefore urgent.” (Paragraph 3.4.5).*

National Infrastructure Delivery Plan (2016)

- 4.75 The Infrastructure and Projects Authority has developed a plan¹¹ that details the mandatory criteria and financial requirements for national infrastructure, as per the statement. The plan emphasises the importance of innovative infrastructure such as energy storage, demand-side response systems, and other intelligent technologies to the UK government.
- 4.76 According to Paragraph 6.10 of the plan, the Government pledged to allocate a minimum of £50 million towards the development of such infrastructure up until 2021. This highlights the government's commitment to investing in sustainable infrastructure and emerging energy technologies.

National Infrastructure Commission: Smart Power (2016)

- 4.77 The National Infrastructure Commission's Smart Power report¹², published in 2016, recommends ways to better balance electricity supply and demand utilizing innovative technology like energy storage and smart grids.
- 4.78 The report emphasises the benefits of these technologies in cutting costs for consumers and reducing carbon emissions. The report also calls for the removal of barriers to adoption of these technologies. Overall, the report outlines a vision for a more sustainable and efficient energy system in the UK.

The Committee on Climate Change: Net Zero, the UK's Contribution to Stopping Global Warming (2016)

- 4.79 The Committee on Climate Change's Net Zero report¹³, published in 2016, is a comprehensive plan for the UK to achieve its target of reducing its carbon emissions to net zero by 2050. The report outlines different pathways to decarbonise the economy, including phasing out petrol and diesel vehicles, increasing renewable energy, and retrofitting buildings. The report notes that achieving net zero is not only necessary to address the urgent threat of climate change, but also presents economic opportunities and benefits for public health.
- 4.80 The report emphasises the decreasing costs of significant renewable technologies like battery storage and recommends promoting flexibility in the energy sector through demand response, storage, and interconnection. The report further advises that regulatory and policy frameworks should encourage such advancements. The information can be found on Page 46 of the report.

¹¹ [National Infrastructure Delivery Plan 2016–2021 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/544211/nidp-2016-2021.pdf)

¹² [IC Energy Report web.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/544211/nic-smart-power-report-2016.pdf)

¹³ [Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/544211/net-zero-the-uks-contribution-to-stopping-global-warming.pdf)

The Infrastructure Planning (Electricity Storage Facilities) Order 2020

- 4.81 The Storage Order¹⁴ has redefined electricity storage facilities in the Planning Act 2008 to simplify the planning permission process for battery storage proposals above 50MW in England. This change allows such proposals to be determined through the shorter TCPA process rather than following the longer NSIP process. The aim is to remove barriers to electricity storage and make it easier for large storage facilities to obtain planning permission.

The Committee on Climate Change: The Sixth Carbon Budget (2020)

- 4.82 The Sixth Carbon Budget is a report¹⁵ published by the Committee on Climate Change that advises the UK government on the volume of greenhouse gases the UK can emit during the period 2033-2037. The Budget provides a roadmap for reducing emissions and achieving net-zero by 2050, including policies and proposals for decarbonization.
- 4.83 The budget has been enshrined in law, with the UK committing to cutting emissions by 78% by 2035 in line with the recommendations. The report emphasizes the urgency of taking action to address climate change and the economic, social, and environmental benefits of achieving net-zero.

Ten Point Plan for a Green Industrial Revolution (2020)

- 4.84 The Ten Point Plan for a Green Industrial Revolution¹⁶ is a UK government strategy announced in 2020 to promote green growth and achieve net-zero emissions by 2050. The plan includes investing in offshore wind, low-carbon hydrogen, nuclear power, and energy storage, as well as the development of carbon capture technologies (page 26). The Plan aims to mobilise government funding to create green jobs, reduce carbon emissions, and support a sustainable economic recovery.

Energy White Paper: Powering our Net Zero Future (2020)

- 4.85 The Energy White Paper: Powering our Net Zero Future¹⁷, published by the UK Government in 2020, outlines the country's pathway to achieving net-zero emissions by 2050. The plan includes measures to improve energy efficiency, promote the use of renewable energy sources, and invest in innovation and research to support the transition to a low-carbon economy.
- 4.86 The paper considers the electrification of heat and its implications for the GB electricity system, as a result of the increased demand for power and the prospect of different demand patterns which arise from using power for heat. The complexity of balancing supply and demand is discussed in detail noting that *"Gas-fired power stations have traditionally provided the flexibility needed to match supply to demand at peak hours, or when renewables output is low. Increasingly, flexibility will come from new, cleaner sources, such as energy storage in batteries".*

¹⁴ [The Infrastructure Planning \(Electricity Storage Facilities\) Order 2020 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

¹⁵ [The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf](#)

¹⁶ [The Ten Point Plan for a Green Industrial Revolution \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

¹⁷ [Energy White Paper \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

National Infrastructure Strategy: Fairer, Faster, Greener (2020)

- 4.87 The National Infrastructure Strategy: Fairer, Faster, Greener¹⁸ is a UK government plan announced in 2020 that outlines a comprehensive approach to infrastructure investments aimed at promoting sustainable economic growth and achieving net-zero emissions by 2050. The plan includes investment in renewable energy, electric vehicles, and low-carbon transport infrastructure, as well as the development of carbon capture technologies. The strategy is designed to create new jobs, reduce carbon emissions, and level up infrastructure across the country.
- 4.88 The government intends to maintain a balance between emissions reduction, system security, and affordable electricity for households and businesses. In order to reach net-zero, the power system must drastically decrease carbon emissions and grow significantly to meet the increasing demand from electrification in transportation, heating, and some industrial processes. A successful expansion of the power system requires additional investment in network infrastructure, flexible sources like storage, demand response, and interconnection, and sufficient low-carbon generation capacity to provide most of the UK's electricity needs.

The National Infrastructure Commission: Net Zero, Opportunities for the Power Sector (2020)

- 4.89 The National Infrastructure Commission report "Net Zero: Opportunities for the Power Sector"¹⁹ examines how the UK can achieve net-zero emissions by 2050. The report identifies key areas of investment to support the expansion of a virtually carbon-free power system, including network infrastructure, flexible sources like storage and demand response, and sufficient low-carbon power generation. It also emphasizes the need to balance emissions reduction, system security, and affordable electricity for households and businesses.

Industrial Decarbonisation Strategy, BEIS (March 2021)

- 4.90 The Industrial Decarbonisation Strategy²⁰, published by the UK's Department for Business, Energy & Industrial Strategy (BEIS) in March 2021, outlines ways for the industrial sector to decarbonize in line with the net-zero target while remaining competitive. The strategy includes reducing emissions through improved energy efficiency, deployment of low-carbon industrial processes, and increased use of renewable energy sources. The paper also highlights the role of hydrogen in decarbonizing industry and discusses support mechanisms for developing and implementing new technologies.

National Grid Future Energy Scenario Report (2022)

- 4.91 The National Grid Future Energy Scenarios Report²¹ ('FES') (2022) examines possible scenarios for the UK's energy system, with a focus on achieving net-zero emissions by 2050. The report explores different policy, technological, and societal assumptions, modelling the potential roles of renewables, nuclear, and hydrogen in the energy mix. It highlights the importance of flexibility and resilience in the energy system and

¹⁸ [CP 329 – National Infrastructure Strategy – Fairer, faster, greener – November 2020 \(publishing.service.gov.uk\)](#)

¹⁹ [Net-Zero-6-March-2020.pdf \(nic.org.uk\)](#)

²⁰ [Industrial Decarbonisation Strategy \(publishing.service.gov.uk\)](#)

²¹ [Future Energy Scenarios \(nationalgrideso.com\)](#)

examines implications for energy security and costs. The report provides detailed analysis and includes recommendations for policymakers and stakeholders.

- 4.92 In order to achieve the goal of net zero emissions by 2050, the energy system will need to continually adapt. The FES presents four distinct, viable scenarios for the development of energy between now and 2050:

- Steady Growth
- Customer Transformation
- System Transformation
- Leading the Way

- 4.93 National Grid “expect battery storage to make up the largest share of storage power capacity in all scenarios by 2050 to help with shifting demand within the day and managing network constraints as battery costs fall” (page 180). Further to this, the Report states that *“battery storage sees the greatest increase in capacity, increasing from 1.6 GW in 2021 to as much as 20 GW by 2030 and 35 GW by 2050 [...] this in part reflects the very large pipeline of battery storage sites”* (page 215).

Sixth Assessment Report: Climate Change Synthesis Report, IPCC (March 2023)

- 4.94 The Sixth Assessment Report (‘AR6’) 2023 is a comprehensive report by the Intergovernmental Panel on Climate Change (IPCC) on the state of global climate science, impacts and risks of climate change, and mitigation and adaptation options.
- 4.95 The AR6 Synthesis Report: Climate Change 2023²² is a summary of the IPCC's Sixth Assessment Report, which provides an overview of the latest scientific knowledge on climate change, its impacts, and how we can mitigate and adapt to it. The report highlights the devastating consequences of climate change and the urgent need to reduce carbon emissions to limit further warming. It provides recommendations for policymakers and emphasizes the importance of international cooperation to address the global challenge of climate change. The AR6 Synthesis Report is subject to final copy editing and layout before publication.
- 4.96 The Report states that *“Electricity from PV and wind is now cheaper than electricity from fossil sources in many regions, electric vehicles are increasingly competitive with internal combustion engines, and large-scale battery storage on electricity grids is increasingly viable”* (page 19)

Draft National Policy Statement for Energy Infrastructure – EN-1 (2021)

- 4.97 The latest version of the national policy for energy infrastructure is outlined in the Draft NPS EN-1²³, paragraph 3.3.15 states that *“There are several different types of electricity infrastructure that are needed to deliver our energy objectives. Additional*

²² [IPCC AR6 Climate Change 2023.pdf](#)

²³ [EN-1 Overarching National Policy Statement for Energy \(publishing.service.gov.uk\)](#)

generating plants, electricity storage, interconnectors and electricity networks all have a role, but none of them will enable us to meet these objectives in isolation.”

- 4.98 Paragraph 3.3.24 states that electricity “Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated.” Paragraph 3.3.25 provides further explanation in that:

“Storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher. Storage can provide various services, locally and at the national level. These include maximising the usable output from intermittent low carbon generation (e.g. solar and wind), reducing the total amount of generation capacity needed on the system; providing a range of balancing services to the NETSO and Distribution Network Operators (DNOs) to help operate the system; and reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases.”

Net Zero Strategy: Build Back Greener (2021)

- 4.99 'Net-Zero Strategy: Build Back Greener'²⁴ was released by the government in October 2021. The strategy outlines strategies and recommendations for decarbonising all UK economic sectors in order to achieve the net zero aim target.
- 4.100 A productive net zero economy must decarbonise the power sector by 2035 in order to satisfy a 40–60% increase in demand. Additionally, the strategy notes that doing so will revitalise communities and open up new employment opportunities all over the UK (paragraph 20, page 99).
- 4.101 According to National Grid's future energy scenarios, a high electrification scenario with heat pumps is the most likely path to achieve the 2035 target, the strategy recognises that decarbonizing gas heating is likely to take longer than decarbonizing the electricity system.
- 4.102 In order to ensure decarbonization without compromising supply security, the Net Zero Strategy states that “this means increased investment in the grid network, electricity storage solutions, and flexible grid management” (page 78).

British Energy Security Strategy (2022)

- 4.103 The British Energy Security Strategy²⁵ outlines the UK Government's objectives to decrease reliance on coal and gas and increase the production and storage of renewable and nuclear energy. In the Networks, Storage and Flexibility section, the government aims to promote all types of flexibility and ensure an efficient and flexible system for both generators and users, which includes having adequate capacity for large-scale, long-term electricity storage (Page 25).

²⁴ Net-Zero Strategy: Build Back Greener
(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf)

²⁵ [British Energy Security Strategy \(publishing.service.gov.uk\)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf)

Powering Up Britain – Energy Security Plan (2023)

- 4.104 The plan²⁶ sets out the UK government's objectives to enhance the country's energy security and seize economic opportunities during the transition to low-carbon energy production. The plan includes a range of measures, such as improving energy system resilience, reducing reliance on fossil fuels, encouraging the use of renewable and nuclear energy sources, and increasing large-scale, long-duration electricity storage. The plan also covers aspects related to climate change adaptation and mitigation.

Energy Security Bill (July 2022)

- 4.105 The Energy Security Bill²⁷, now known as the Energy Bill, was introduced to Parliament on 6 July 2022 to deliver a cleaner, more affordable, and more secure energy system.
- 4.106 The Energy Security Bill factsheet: Defining electricity storage (June 2023)²⁸ explains that flexibility from technologies such as electricity storage could save up to £10 billion per year by 2050 by reducing the amount of generation and network needed to decarbonise whilst creating 24,000 jobs.
- 4.107 Government is legislating to clarify electricity storage as a distinct subset of electricity generation in the 1989 Electricity Act.
- 4.108 Formalising electricity storage as a distinct subset of generation removes current ambiguities and provides long-term clarity and certainty over its treatment within the existing frameworks (e.g., planning and licensing) and possible future frameworks.
- 4.109 Government is facilitating the deployment of electricity storage at all scales through the joint Ofgem and BEIS Smart Systems and Flexibility Plan. This focuses on actions to create a best-in-class regulatory framework by removing regulatory and policy barriers to the implementation of storage, ensuring that markets reflect the value of flexibility to the system and investing in innovation. Defining electricity storage in primary legislation is central to this approach.

Local Supplementary Planning Documents / Guidance adopted by RBC

- 4.110 There are two adopted Supplementary Guidance Documents which can be deemed relevant to the Site and the Proposed Development:

- Biodiversity and Development (Adopted January 2008 – Updated added February 2017)
- Climate Adaption (June 2012)

Biodiversity and Development

- 4.111 The SPD emphasises that the challenges of climate change are necessitating significant changes to the approach to new development and outlines actions for developments to help climate change adaption. It states that proposals for new development will be expected to demonstrate how the overall layout and massing of the development will be designed around natural vegetation and green space, rather than vice versa. Further

²⁶ [Powering Up Britain: Energy Security Plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/powering-up-britain-energy-security-plan)

²⁷ [Energy Security Bill - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/bills-2022/energy-security-bill)

²⁸ [Energy Security Bill factsheet: Defining electricity storage - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/energy-security-bill-factsheet-defining-electricity-storage)

to this, it encourages the implementation of green walls and highlights that they provide valuable habitats for wildlife.

Biodiversity and Development

- 4.112 This SPD has been prepared to highlight biodiversity and development issues in Rochdale and to ensure that development embraces opportunities to further enhance biodiversity where possible.

Publication Version Places for Everyone

- 4.113 PfE will provide a key part of the development plan of nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) for jobs, new homes, and sustainable growth, for the period up to [2037]. It has been published by the Greater Manchester Combined Authority (GMCA) on behalf of the nine districts.

- 4.114 The plan began in 2014 as the Greater Manchester Spatial Framework (GMSF) and was subject to public consultation in 2016 and 2019. Stockport Council withdrew from the GMSF in early 2020, and the remaining nine districts decided to continue to produce a joint plan, now known as Places for Everyone (PfE). The publication Version PfE was submitted for Examination in February 2022.

- 4.115 Once adopted, PfE will:

- Set out how the nine boroughs should develop up until 2037;
- Identify the amount of new development that will come forward across the 9 districts, in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused;
- Support the delivery of key infrastructure, such as transport and utilities;
- Protect the important environmental assets across the city region;
- Allocate sites for employment and housing outside of the existing urban area; and
- Define a new Green Belt boundary for Greater Manchester.

- 4.116 PfE contains a number of strategic objectives and policies, including:

- **Objective 7** 'Playing our part in ensuring Greater Manchester is a more resilient and carbon neutral city-region' highlights the regions priority for improving energy efficiency and the generation of renewable and low carbon energy.
- **Objective 8** 'Improve the quality of our natural environment and access to green spaces' confirms important landscapes, green infrastructure and biodiversity will be enhanced.
- **Policy JP-Strat 6 'Northern Areas'** states that a significant increase in the competitiveness of the northern areas will be sought. This includes Rochdale.

Whilst it seeks to prioritise the re-use of previously developed land, it acknowledges that the selective release of Green Belt in key locations will be needed to help boost economic opportunities and diversify housing provision.

- **Policy JP-S 2 ‘Carbon and Energy’** seeks to ensure Greater Manchester is carbon neutral no later than 2038 through a range of measures including taking a positive approach to renewable and low carbon energy schemes.
- **Policy JP Allocation 19 ‘Bamford / Norden’** proposes to remove the land immediately adjacent to the east of Furbarn Road from the Green Belt and allocate it as a housing site for approximately 450 dwellings. The policy contains a number of criteria that any development coming forward would be required to adhere to in order to create a sustainable form of development and protect areas of retained Green Belt.

- 4.117 PfE is supported by a substantial evidence base that has been gathered over a number of years. This evidence base includes documents that demonstrate the need for the housing growth proposed in PfE, provides the exceptional circumstances to remove land from the Green Belt, and contains a detailed site selection methodology to justify why the proposed allocations are suitable for development.

Summary

- 4.118 The proposed site is situated within the Green Belt. To secure approval, it is necessary to demonstrate very special circumstances that carry significant weight, capable of surpassing the harm caused to the Green Belt and any other associated harm. Both national and local planning policies, along with numerous legislations, strategies, and policies, strongly support the establishment of additional infrastructure for renewable energy production and electricity storage. However, it is crucial to ensure that such facilities are appropriately located, where adverse effects on the natural and built environment can be avoided, minimised, and mitigated as necessary.
- 4.119 Battery storage is recognised as a key technology for enhancing energy flexibility and facilitating optimal utilisation in power systems. Energy storage projects are also deemed essential for transitioning the United Kingdom away from fossil fuels and accomplishing its climate change objectives.

5. Green Belt Assessment

- 5.1 This section appraises the Proposed Development against Green Belt policy, as expressed within the NPPF and the adopted and emerging Development Plan.
- 5.2 The Government places great importance on Green Belts; their fundamental aim is to prevent urban sprawl by keeping land permanently open (Framework Para 137). Inappropriate development will only be allowed in 'Very Special Circumstances' ('VSC') which will not exist unless the harm to Green Belt by way of inappropriateness, and any other harm resulting from the proposal is clearly outweighed by other considerations.
- 5.3 The Very Special Circumstances test has been considered a number of times by the courts. However, the principles are now well-settled, namely that the test involves a broad discretion on the part of the decision-taker.
- 5.4 In *R(oao Temple) v Basildon District Council* [2004] EWHC 2759²⁹ (Admin) Sullivan J (as he then was) observed:

"...the decision-taker must be able to point to a circumstance, or combination of circumstances which, viewed objectively, is reasonably capable of being described as 'very special'," (paragraph 15)

"The short answer to the claimant's argument is that in planning, as in ordinary life, a number of ordinary factors may when combined together result in something very special. Whether any particular combination amounts to very special circumstances...will be a matter for the planning judgement of the decision-taker" (paragraph 17)

"...The question is not merely whether there are very special circumstances, but whether those circumstances clearly outweigh the harm done by reason of inappropriateness and any other harm. Thus, a combination of factors which amounted to special circumstances might be sufficient to clearly outweigh the limited degree of harm that would be caused by granting planning permission upon one particular site, but the same or a similar combination of factors might well be insufficient to justify the grant of planning permission for a site that was more harmful in planning terms, for example because it had a greater impact upon the underlying objectives of the Green Belt; it was more harmful in terms of the character or appearance of the countryside; it had a greater effect upon residential amenity and/or highway safety, etc." (paragraph 18)

- 5.5 The judgement makes clear that it is possible for a number of factors, whilst ordinary in themselves, could in combination clearly outweigh the harm arising from development proposals in the Green Belt, including that arising from inappropriateness, and result in the VSC test being satisfied.

²⁹ [Basildon District Council, R \(on the application of\) v Temple \[2004\] EWHC 2759 \(Admin\) \(08 November 2004\) \(bailii.org\)](#)

- 5.6 This approach was most recently confirmed in *Sefton MBC v SSHCLG* [2021] EWHC 108230 (Admin), [34] the High Court further observed that NPPF 143 and 144 “do not ... require a particular mathematical exercise nor do they require substantial weight to be allocated to each element of harm as a mathematical exercise with each tranche of substantial weight then to be added to a balance”.
- 5.7 The Court continued at paragraph 34 that the test requires “a single exercise of judgement to assess whether there are very special circumstances which justify the grant of permission *notwithstanding the particular importance of the Green Belt*”.

Green Belt Harm

- 5.8 Guided by national policy, harm to the Green Belt must be considered in respect of the following three aspects:
- The definitional harm resulting from any inappropriate development in the Green Belt;
 - The impact on the openness of the Green Belt; and
 - The impact on the purposes of including land within the Green Belt.
- 5.9 It is also necessary to consider the extent to which the Proposed Development is aligned with national policy objectives which encourage the beneficial use of Green Belt land³¹. Each is addressed in turn below:

Definitional Harm

- 5.10 Paragraph 149 of the Framework states that local planning authorities should regard the construction of new buildings as inappropriate development in the Green Belt. Paragraph 149 and 150 then provide a closed list of “exceptions” (i.e., development that would not be inappropriate development in the Green Belt).
- 5.11 Some parts of the development would comply with some of the exceptions listed in paragraphs 149 and 150. In particular, the creation of access roads³² into and within the site and the provision of new tree planting / other areas of landscape planting would not include built development and would not, therefore, impact on openness. They would therefore comply with the exceptions listed at paragraph 150 of the Framework and would be not inappropriate development in the Green Belt.
- 5.12 However, when taken as a whole the Proposed Development would be inappropriate development within the Green Belt and result in definitional harm to the Green Belt.
- 5.13 Harm to Openness

³⁰ [Sefton Metropolitan Borough Council v Secretary of State for Housing, Communities, and Local Government](#) [2021] EWHC 1082 (Admin) (07 May 2021) (baillii.org)

³¹ The Framework, paragraph 81

³² The creation of access roads would comprise engineering operations

- 5.14 Maintaining the openness of the countryside is a key objective of Green Belt policy. The inappropriateness of development in respect of impact on “openness” has been considered in case law. This has confirmed that determining the impact of development on openness cannot be considered only in spatial terms but must expressly consider the visual dimension. In Samuel Smith Old Brewery the Court of Appeal 33 stated that:
- 5.15 “Whether, in the individual circumstances of a particular case, there are likely to be visual as well as spatial effects of the openness of the Green Belt, and, if so, whether those effects are likely to be harmful or benign, will be for the decision-maker to judge. But the need for those judgments to be exercised is, in my view, inherent in the policy.”
- 5.16 The effect of the Proposed Development on openness of the Green Belt is considered below.
- 5.17 The Site comprises an undeveloped field enclosed by The Rake, Furbarn Road and Lower Jowkin Lane. Existing tree and hedgerow cover provides some screening of views into the site from these adjacent roads. Overhead power lines traverse the northern portion of the site on a north-south alignment. The sense of openness is lessened by the presence of the overhead lines, the clear views of the transmission towers in adjacent fields, the presence of the existing farm buildings and cattery to the west, the individual residential properties located to the east and by Scott House to the north east.
- 5.18 Development within the site will be concentrated in the western and central areas of the site. The eastern part of the site is proposed to be utilised for tree planting in order to screen views of the Proposed Development from the east. Spatially, approximately 47% of the site would remain undeveloped.
- 5.19 The impact of the Proposed Development on the openness of the Green Belt would be significant, notwithstanding the careful and sensitive approach which has been taken to the design of the scheme (as is explained within the accompanying Design and Access Statement) and its temporary nature. As is advised by National Planning Guidance, an assessment of the impact of a Proposed Development on openness must also be informed by considered of the temporal duration of the project and any proposals to return the land to its original state. In this case the Proposed Development would be subject of a temporary permission for 30 years and the applicant has invited a planning condition in relation the approval of a site restoration strategy.
- 5.20 The assessment of significant harm to the openness of the Green Belt must also be placed in the context of the emerging PfE which proposes the release of a significant parcel of land to the south of Furbarn Road for the development of 450 homes (Policy JPA19). The plan has progressed through several rounds of consultation and Public Examination and whilst it can only be given limited weight at this stage, future

³³ Samuel Smith Old Brewery (Tadcaster) v North Yorkshire CC [2018] EWCA Civ 489 (NB this aspect of the judgment not impacted by the judgment of the Supreme Court: [2020] UKSC 3.

confirmation of the allocation and implementation of the residential development will further lessen the sense of openness of the Green Belt within the application site.

Impact on Purposes of Including Land within the Green Belt

- 5.21 The Greater Manchester Green Belt Assessment ('GMGBA') was completed on behalf of the Greater Manchester Local Authorities in 2016 as part of the PFE submission. It assesses the extent to which land defined as being within the Green Belt contributes to the purposes of including land within the Green Belt.
- 5.22 The application site is located within land parcel reference RD37, which is located to the west of Bamford and is bound by dense woodland adjacent to Naden Brook further west. There are existing urbanising features within the parcel, though the vast majority of the parcel comprises of pasture fields with several farmsteads and a number of isolated dwellings. The purposes of including land within the Green Belt are set out within paragraph 138 of the NPPF. Table 5.1 below assesses the impact of the Proposed Development on those purposes.

Table 5.1: Assessment of Impact on Purposes of Including Land within the Green Belt

Purpose	Assessment
(a) To check the unrestricted sprawl of large built-up areas	Parcel RD37 of the GMGBA is assessed as making a strong contribution to this purpose. The application site itself is not presently located directly adjacent to the existing urban area and represents a relatively small proportion of parcel RD37. It is contained by existing roads, trees and hedgerows. Development of the site would moderate harm to this Green Belt purpose³⁴. This harm should be viewed in the context of a significant proportion of Parcel 37 being proposed for release from the Green Belt through the PFE plan (Policy JPA19). The effect of the release of land within allocation JPA19 on this Green Belt purpose is assessed as relatively significant.
(b) To prevent neighbouring towns from merging into one another	Parcel 37 of the GMGBA is assessed as making a weak contribution to this Green Belt purpose. The application site is located to the west of Rochdale and east of Bury. The separation

³⁴ This calibration of harm should be viewed in the context of a significant proportion of Parcel 37 being proposed for release from the Green Belt through the PFE plan (Policy JPA19). The effect of the release of land within allocation JPA19 on this Green Belt purpose is assessed as "relatively significant".

	between these towns would be maintained by other fields which would be retained and which make a much stronger contribution to preventing the merger of the towns. There would be no harm to this Green Belt purpose.
(c) To assist in safeguarding the countryside from encroachment	Parcel 37 of the GMGBA is assessed as making a strong contribution to this purpose. The Proposed Development would be concentrated in the western part of the site which would be the furthest point from existing residential development. It will be separated and contained through existing and proposed landscape planting including new trees and hedgerows. The built development and infrastructure development would occupy 0.37 hectares of the 0.69 total site area (53%). The Proposed Development would result in encroachment into the countryside from which moderate harm to this Green Belt purpose would arise³⁵.
(d) To preserve the setting and special character of historic towns	The site has no physical or visual link to a Historic Town. Similarly, there are no Conservation Areas nearby³⁶. The site makes no contribution to this Green Belt purpose and is a relatively large distance to the nearest historic settlement of Rochdale Town Centre. The introduction of the Proposed Development would cause no harm.
(e) To assist urban regeneration by encouraging the reuse of derelict and other land	An alternative sites assessment has been prepared which confirms the basis on which the application site has been selected and the reasons why it cannot be accommodated within the urban area. There would be no harm to this Green Belt purpose.

Summary of Impacts of Green Belt Purposes

- 5.23 In summary, it is considered that the development would have the following impacts on the purposes of including land in the Green Belt:

³⁵ This calibration of harm should be viewed in the context of a significant proportion of Parcel 37 being proposed for release from the Green Belt through the PFE plan (Policy JPA19). The effect of the release of land within allocation JPA19 on this Green Belt purpose is assessed as “relatively significant”.

³⁶ The GMGBA states that that the parcel plays no role in the setting or significant of any historic settlements.

Table 5.2: Summary of Impacts on green Belt Purposes

Green Belt Purposes	Proposed Development
Purpose A: Checking unrestricted sprawl	Moderate
Purpose B: Preventing towns from merging	No harm
Purpose C: Safeguarding the countryside from encroachment	Moderate
Purpose D: Preserving the setting of historic towns	No harm
Purpose E: Promoting urban regeneration	No harm
Overall harm to purposes	Moderate

Assessment of ‘Other Harm’

- 5.24 Section 6 of this report summarises the conclusions of various technical reports which have assessed the potential impacts of the Proposed Development on relevant technical and environmental considerations and in doing so confirms the extent to which the Proposed Development may cause ‘other harm’ to be weighed in the balance as part of the Green Belt assessment.

Non-designated Heritage Assets

- 5.25 An NPPF compliant Heritage Statement has been completed. This confirms that the Proposed Development will be visible from Scott House and will introduce a form of built development that does not currently exist within the rural landscape setting to the south of the former hospital.
- 5.26 The Proposed Development on the setting and the local significance of Scott House would give rise to a low degree of harm. This is a material consideration to be given limited weight and to be proportionately addressed in the planning balance taking into account the merits of the Proposed Development including economic, social or environmental objectives as described at Paragraph 8 of the NPPF.

Landscape Character and Visual Impact

- 5.27 The LVIA identifies that the Proposed Development would result in a **low** magnitude of change (adverse) to the landscape character of the wider area upon completion of construction which would reduce to **very low** after 15 years with maturation of the proposed landscape planting.
- 5.28 The development would result in a **high** magnitude of change to the landscape character of the site itself upon completion of development, reducing to **medium-high** after 15 years (neutral) and the establishment of planting.
- 5.29 The effects of the development on the landscape fabric of the site would result in a **low** magnitude of change (adverse) on completion of the development. Upon maturation of the landscape planting over 15 years some **beneficial effects** would be realised. Overall, the effect after 15 years would be neutral.

- 5.30 In overall terms the effects to landscape character and fabric would range from minor-moderate adverse after 15 years and would not be significant.
- 5.31 The effects of the Proposed Development to visual amenity have also been assessed from a number of viewpoints. Upon completion of development the effects would range from **low- medium adverse** (i.e., from nearby PROW and adjacent highways) Upon maturation of the proposed landscape planting the effects would reduce to **negligible - low adverse**.
- 5.32 In overall terms there would be no significant effects to visual amenity.

Noise, Transport, Drainage & Ecology

- 5.33 Relevant technical assessments have been completed for each discipline. These confirm that, subject to the accordance with relevant noise limits (which can be controlled by condition) there would be **no harm** to the amenities of nearby existing and future residential properties. The site can be accessed from the existing highway network and there would be **no harm** arising from monthly visits to the site from a maintenance vehicle. The surface water run-off from the development can be managed through soak away naturally through the permeable surfaces and there would be **no harm** in this regard. The Proposed Development would deliver a **net gain** to ecology and biodiversity.

6. Overall Assessment of Harm to the Green Belt and other harm

6.1 In summary, the development will give rise to the following harm to the Green Belt and other harm.

- When taken as a whole the Proposed Development would be inappropriate development in the Green Belt, which represents definitional harm of substantial weight.
- The development would result in some loss of openness within the Green Belt, notwithstanding the careful and sensitive approach to design which has been adopted. This would cause **significant harm** and also attracts substantial weight.
- The development would contribute to urban sprawl and would result in **moderate harm** to this purpose. This attracts moderate weight.
- The development would result in encroachment into the countryside. This would result in **moderate harm** to this purpose. This attracts moderate weight.
- There would be **low harm** the setting and significance of a non-designated heritage asset. This harm attracts limited weight.
- There would be **low – high** harm to landscape character and features and visual amenity in the short-term following completion of the development. However, as the landscape planting and enhancements mature over time the visual these effects would reduce to **negligible – low** in the longer term. These harms attract moderate weight.

Very Special Circumstances

6.2 In order for the VSC to exist, the totality of any harm identified must be clearly outweighed by the benefits / material considerations supporting the Proposed Development. As the courts have noted, the material considerations do not themselves all have to be “very special”, they can indeed be ordinary when considered individually. However, when considered cumulatively they must clearly outweigh the harm identified such that, overall, the VSC necessary for a grant of planning permission in the Green Belt exists.

6.3 The VSC is comprised of six benefits:

- **VSC1:** Contribution to meeting the national need for battery energy storage systems (BESS) facilities and in doing so allowing the usable output from intermittent renewable energy generation (such as from wind and solar) to be maximised which in turn will contribute to the meeting of legal obligations and policy objectives relating to climate change and in supporting greater levels of national energy security.

- **VSC2:** Contribution to address Climate Emergency objectives, including reducing levels of greenhouse gas emissions.
- **VSC3:** The absence of alternative sites located outside the Green Belt capable of accommodating the Proposed Development and located within a reasonable distance of the identified point of connection to the electricity network.
- **VSC4:** Contribution to enhancement of local landscape character through the incorporation of appropriate new Green Infrastructure.
- **VSC5:** Delivery of Biodiversity Net Gain.
- **VSC6:** The temporary nature of the Proposed Development and the reversibility of the identified impacts upon decommissioning of the Proposed Development and reinstatement of site conditions.

VSC1: Contribution to Meeting a National / Regional Need for BESS and Facilitating Greater Levels of Renewable Energy Generation

- 6.4 The Climate Change Act 2008 (2050 Target Amendment) Order 2019 sets a legally binding obligation for the UK to achieve at least a 100% reduction in greenhouse gas emissions, compared to 1990 levels, by 2050 (“net zero”). The pathway to net zero includes an interim target of a 78% reduction in greenhouse gas emissions (compared to 1990 levels) by 2035. A significant part of meeting this obligation will be to ensure the most efficient and renewable production and supply of energy as possible.
- 6.5 To realise its ‘net-zero’ objectives the Government has published a wealth of policy documents and strategies targeted at supporting the deployment of renewable and low carbon sources energy in appropriate locations, as summarised in Section 4.
- 6.6 These policy/ strategy documents include the NPPF (2021), NPS-EN1 (2021), Draft NPS EN-1 (2023), the Ten Point Plan for a Green Industrial Revolution (2020) and the Energy White Paper (2020). Each of these recognises that, to maximise the usable output from intermittent sources of energy generation (such as wind and solar) there is an urgent national need for the deployment of greater levels BESS.
- 6.7 BESS is recognised as a form of energy generation and supports the utilisation of electricity generated from renewable sources in numerous ways:
- by balancing ‘supply and demand’ within the electricity network;
 - by helping avoid or defer costly upgrades to network infrastructure and in doing so helping to accelerate the deployment of renewable energy generation;
 - by helping minimise the need to curtail the output of energy generation from renewable sources.
- 6.8 BESS also provides additional benefits in relation to:
- decentralisation of the electricity grid.
 - reducing the cost of energy to consumers; and

- increasing levels of national energy security.

Balancing Demand

- 6.9 In accordance with national policy objectives, the total amount of electricity supplied from fossil fuels has declined substantially since 2012. In the same period the amount of electricity generated from renewable sources including wind and solar increased substantially, accounting for c41.4% of all generation in 2022/23.
- 6.10 Whilst increased levels of generation from renewable sources is welcomed, the level of electricity generation within the system needs to equal the level of demand for the system to be 'in balance' and to prevent 'black-outs' or 'brown-outs'.
- 6.11 Balancing the grid is becoming more challenging as generation from intermittent sources of energy (such as wind farms and solar arrays) continues to increase and becomes a much larger proportion of the overall energy mix and the demand for electricity increases in response to external factors such as the increasing uptake of electric vehicles.
- 6.12 Increasing occurrences of electricity generation meeting and exceeding demand creates a requirement for 'system services' such as BESS which are able to store electricity when generation exceeds demand and rapidly release it back into the network during peak periods when demand exceeds supply or when unforeseen strain is placed on the network (for example when supply from a large power station is temporarily curtailed).
- 6.13 BESS therefore contribute to ensuring a steady supply of energy produced from renewable sources to the local and national network, which would otherwise be lost.
- 6.14 The Government's Energy White Paper explains that gas-fired power stations have traditionally provided the system flexibility to match generation supply to demand at peak times or when renewable output is low but that increasingly *"flexibility will come from new, cleaner sources, such as energy storage in batteries"*³⁷. These new forms of flexibility *"could lower costs for consumers by minimising expensive network reinforcement or reducing the need for additional generation capacity, especially peaking capacity which needs to be deployed quickly to meet spikes in demand"*.³⁸
- 6.15 The National Infrastructure Commission's Smart Power report³⁹ further explains that as we switch to intermittent and less flexible sources of energy generation (such as renewables) demand for system services such as BESS is expected to multiply by up to ten times.
- 6.16 The Smart Systems and Flexibility Plan⁴⁰ identifies that in order to achieve the deep power sector decarbonisation needed to achieve the Sixth Carbon Budget, significantly higher levels of system flexibility will be needed as renewable power replaces fossil fuels and heat and transportation is electrified: around 30GW of low carbon flexible

³⁷ Energy White Paper (2020), Page 72

³⁸ Energy White Paper (2020), Page 72

³⁹ Smart Powe, National Infrastructure Commission Report, Page 22

⁴⁰ Smart Systems and Flexibility Plan 2021, BEIS (Page 5)

capacity may be needed by 2030 and 60GW by 2050 in order to maintain energy security and cost-effectively integrate high levels of renewable energy generation. There is presently 1GW of battery storage presently operational and 8GW in the development pipeline; a considerable 'gap' therefore exists.

- 6.17 The Infrastructure Commission report⁴¹ goes onto confirm that providing flexibility from systems such as BESS would mean that the UK is able to build fewer power stations, integrate more low carbon electricity at lower cost and use all the assets in the electricity system more effectively.

Deferring and / or Avoiding Network Upgrades and Accelerating the Deployment of Renewable Energy Generation

- 6.18 The transition from fossil-fuel based generation of electricity to that generated from renewable sources together with changes in the type and scale of demand on the network (i.e., increased demand from electric vehicle charging infrastructure) increasingly requires significant investment in upgrades and reinforcements to the electricity transmission and distribution networks.
- 6.19 The consenting and construction process involved in the delivery of these upgrades / reinforcements can be contentious and protracted, delaying the speed at which new sources of renewable energy generation can be connected to the system. It is not uncommon for developments which benefit from planning permission to have to wait a number of years before they can be connected to the electricity network.
- 6.20 To accelerate the speed at which sources of renewable energy generation can be connected, National Grid Electricity Systems Operator (NGESO) launched a number of 'pathfinder projects' inviting and incentivising developers to build supporting infrastructure.
- 6.21 BESS are seen as being important means by which the potential from renewable energy can be maximised. National Grid estimate that 13GW of new electricity storage in England and Wales is required by 2030 in order to support the scale of renewable energy generation needed to meet net-zero objectives.⁴²

Maximising the Utilisation of Electricity Generated from Renewable Sources

- 6.22 As noted above, BESS allows electricity to be stored during periods of high generation and low demand and to be released onto the network during periods of high demand / low generation.
- 6.23 This facility is important to the efficient operation of the grid as a lack of capacity within the network can require the output from some sources of renewable energy generation (particularly wind and solar) to be curtailed or "turned down" at certain times. The incorporation of system services such as BESS allows these sources of renewable energy generation to operate unabated with the electricity, they produce stored and released back onto the grid when constraints are relieved or when demand

⁴¹ Smart Powe, National Infrastructure Commission Report, Page 22

⁴² Future Energy Scenarios Report (NGESO), 2021

exceeds supply. This allows the usable energy generation from renewable sources to be maximised.

Contribution to reducing the cost of Energy to Consumers

- 6.24 BESS can help to reduce the cost of energy for consumers by storing excess energy when costs of production are low. A report produced by National Grid⁴³ explains that BESS is critical to be able to increase supply during periods of peak demand and to help reduced costs to consumers. Furthermore, the British Energy Security Strategy explains that improved energy storage and flexibility would make the network more efficient and bring costs down by £10billion a year which would then be passed onto the consumer.

Contribution to Increased National Energy Security

- 6.25 The deployment and incorporation of greater levels of BESS will enable reduced levels of reliance on fossil-fuel based power generation, a proportion of which is imported into the UK from overseas, the price being influenced by macro-economic factors such as the war in Ukraine. The British Energy Security Strategy was published by the Government in 2022 in response to such events and encourages the deployment of long duration electricity storage as part of the transition to greater electricity generation from renewable power.

Contribution to Decentralisation of the Grid

- 6.26 Battery energy storage facilities play a fundamental role in decentralising the grid system, enabling power to be generated and stored in specific localised areas where it is required. Increasing the amount of operational storage reduces the over-dependence on centralised, fossil-fuel facilities, which in turn has a cumulative effect on reducing CO2 emissions and de-carbonising the grid. Decentralisation is key in increasing efficient energy generation, with less reliance on centralised facilities to overproduce in operation to account for transmission loss over greater distances.
- 6.27 In summary the Proposed Development would provide 98MW of storage capacity and would make a meaningful and tangible contribution to meeting the urgent national need for additional BESS.
- 6.28 In making this contribution the Proposed Development would assist in the realisation of the benefits outlined above including: enabling the utilisation of electricity generated from renewable sources of power to be maximised, reducing our reliance on generation from fossil-fuels, providing greater levels of national energy security and contributing to lower the cost of energy supplied to consumers.
- 6.29 The Proposed Development is entirely aligned with strategic national planning and energy policy relating to energy infrastructure, generation and decarbonisation: policy which offers comprehensive and wide-ranging support for the deployment of BESS.
- 6.30 The Proposed Development is also entirely aligned with the provisions of the adopted development plan which also encourages and gives considerable weight to development which contributes to more resilient and decentralised energy and heating networks and the reduction of greenhouse gas emissions (Policy G1 and G3). Therefore,

⁴³ A Day in the Life 2035, National Grid

the Proposed Development will contribute to Solihull's aim to deliver renewable energy within the Development Plan, given that battery storage facilities contribute to the decarbonised of the energy infrastructure.

- 6.31 The Proposed Development will also provide much-needed flexible back-up generation capacity that enable a greater dependence on renewable energy in the generation mix as a form of carbon-free energy storage. Therefore, the proposed development will provide greater capacity and flexibility in the energy generation network and support the shift towards a low carbon network.
- 6.32 Consequently, the Proposed Development is needed to allow the sustainable delivery of energy to local people and businesses, particularly during peak periods of demand and from renewable energy sources as they steadily supply the Grid. The proposed development will thus maintain power to local homes, businesses and services which are fundamental to the society and economy of the region.
- 6.33 In conclusion, the Proposed Development will make a notable contribution to addressing the national and regional need for battery storage, delivering on the aims and commitments of local and national planning and energy policy. As a result, VSC#1 attracts **substantial weight** in its own right in the planning balance and determination of the application.
- 6.34 Attributing such weight to the need and wider environmental benefits of the Proposed Development is supported by appeal decision reference APP/C3430/W/22/3292837 made by Balance Power Projects Ltd against South Staffordshire District Council for a battery storage facility. A range of other relevant appeals are also explored in the dedicated section below (Paragraphs 6.59 to 6.66).

VSC2: Contribution to Addressing Climate Emergency Objectives

- 6.35 The Greater Manchester Combined Authority (GMCA) has developed the Greater Manchester Environment Plan which sets out a vision for a clean, carbon neutral, climate resilient city region with a thriving natural environment and circular, zero-waste economy. The GCMA have set the following targets:
- Bring CO2 emissions to net zero by 2038
 - Add 57MW of local renewable electricity generation by 2024
 - Add another 57MW of energy supply through other sources
- 6.36 In July 2019 Rochdale Borough Council passed a motion on climate change and joined a number of local authorities who have declared a climate emergency. RBC has pledged to work towards ensuring that the Council and the borough is carbon neutral by 2038.
- 6.37 The borough's Climate Change Action Plan highlights renewable electricity generation as a tool to reduce the use of fossil fuels that are harmful to the environment and provide an affordable and clean energy alternative. The Plan acknowledges that from April 2022, the borough will need to development smart energy projects to support

GCMA ambitions for at least 85MW of power generation and supporting battery storage⁴⁴

- 6.38 BESS has been classified as a form of energy generation and will assist the Government in meeting its legal obligations in relation to achieving a 100% reduction in greenhouse gas emissions compared to 1990 levels by 2050. It will also assist in ensuring enhanced levels of national energy security.
- 6.39 The borough currently has only 15GWh of renewable power therefore the Proposed Development will contribute to RBC's climate emergency objectives by providing a 57MW of battery storage.
- 6.40 The proposed BESS will be sufficient to provide electricity to approximately 20,000 homes for up to 2 hours, with GHG savings in the first year of circa 4,116 tCO₂e forecast, equivalent to taking 2,225 cars off UK roads. Cumulatively the Proposed Development will deliver GHG emission savings of 21,088 tCO₂e may be achieved over a 15-year period.
- 6.42 VSC2 attracts **substantial weight** in its own right in the planning balance and determination of the application.

VSC3: Absence of non-Green Belt Alternatives

- 6.41 There are no sites located outside the Green Belt which are capable of accommodating the Proposed Development and which are located within a reasonable distance of the designed point of connection to the electricity grid.
- 6.42 This is demonstrated through an Alternative Sites Assessment ('ASA') contained in **Appendix 3** which provides much greater associated detail and is only summarised here.
- 6.43 In undertaking the ASA, a series of stages were followed, as set out in the Site Selection Criterion shown in Table 1 of the appended ASA:
- **Stage 1** – A 2km 'search area' around the identified point of connection at Rochdale Substation was defined.
 - **Stage 2** – Utilising web-based resources such as MagicMap, a constraints map was generated identifying all sites located within national and local nature conservation sites, national landscape designations, scheduled ancient monument designations, conservation areas and flood risk zones 2 and 3. Such sites were discounted from further consideration.
 - **Stage 3** – Land outside these designations was assessed in greater detail against the remaining criteria to assess suitability. Only sites meeting all relevant criteria were progressed to land-owner identification and negotiation.

⁴⁴ Ref CC20 of the Climate Change Action Plan - [Climate Change Action Plan \(rochdale.gov.uk\)](https://www.rochdale.gov.uk/Climate-Change/Climate-Change-Action-Plan)

- **Stage 4** – Where sites were identified as being technically suitable, details of the landowner(s) were obtained through land registry searches and each relevant landowner would have been contacted individually by letter.
- 6.44 In accordance with Stage 1, the ‘Constraints Plan’ provided at **Appendix 2** shows a 2km search area. As shown on the plan, the proposed site is entirely surrounded either by the wider Green Belt or by residential development to the west.
- 6.45 The assessment process initially identified 12 vacant sites within the search area (Stage 1). Of these, 7 sites were discounted at Stage 2 based on the total land area being below the minimum 0.7 hectares required to support the Proposed Development.
- 6.46 The remaining sites were then tested against the detailed criteria specified in Table 1 of the ASA. None are suitable for accommodating the Proposed Development for either one or more the following reasons:
- The distance of the grid connection route between the site and the Rochdale Sub Station exceeding 2km.
 - The developable area being below the 0.7 hectares minimum requirement when various constraints are factored into consideration.
 - Proximity to listed buildings.
 - The location of parts of sites within Flood Risk Zone 3.
 - The location of whole or parts of sites within the Green Network (as defined within the Allocations Plan of the CS).
 - The presence of public rights of way / footpaths within sites which precludes the creation of a safe and secure development.
- 6.47 Considering the above, it is concluded that there are **no sites** located outside the Green Belt within 2km of the identified point of grid connection which are suitable for and capable of accommodating the Proposed Development.
- 6.48 This consideration attracts **substantial weight** in its own right in the planning balance, the calibration of which is supported by the appeal decisions at paragraphs 6.59 to 6.66.

VSC4: Benefits Arising from Green Infrastructure

- 6.49 The proposed Landscape Strategy will include individual tree planting to Lower Jowkin Lane, Furbarn Road and Rake Lane to provide screening benefits and enhance the rural lane characteristic. Species have been chosen to be consistent with existing species on Site and locally. A native woodland block would be planted between the battery/inverter units and the overhead powerline easement to provide further visual screening and to help assimilate the proposals into the wider landscape pattern.
- 6.50 The existing and proposed green infrastructure would screen the proposals in long-range views from the surroundings. However, in the short-range views from the east and south, the barn structures would terminate views with a feature that is common in

this agricultural landscape. The barn structures would also screen many of the exposed battery storage and inverter units to the north (beyond the buildings).

- 6.51 The Proposed Development will seek to introduce new native and species-rich hedgerows to reinstate the field boundaries of the Site as well as enhancement to the existing hedgerows. Hedgerows are a strong characteristic within the wider landscape. Hedgerows to the perimeter of the Site would provide wildlife connections between various existing on and off-site habitats as well as proposed on-site habitats.
- 6.52 The Site provides an opportunity to create a meadow grassland habitat outside of the BESS compound for biodiversity enhancements. The site would utilise a species-rich grassland composed of wildflowers and fine grasses which can support a wide range of invertebrates, small mammals, reptiles and birds.
- 6.53 The benefits to landscape character attract **limited weight** in the planning balance.

VSC5: Contribution to Biodiversity Net Gain

- 6.54 The Proposed Development is set to be complemented with a substantial landscaping scheme, focused upon the planting of native tree, shrub and grassland habitats, which will bring with its notable benefits and gains to biodiversity for the site and its surroundings. Subject to the implementation of the Proposed Development and its associated landscaping scheme, as set out in the accompanying Biodiversity Gain Assessment, this would secure an no net loss in biodiversity at area-based habitats and a significant net gain for biodiversity at hedgerow / linear-based.
- 6.55 The contribution to enhancement of biodiversity net gain attracts **moderate weight** in its own right in the planning balance

VSC6: Temporary and Reversible Impacts

- 6.56 Full planning permission is sought for the Proposed Development for a temporary period of 30 years. After the 30 years of operation, the Proposed Development would be decommissioned. All electricity generating equipment, built structures and **associated** infrastructure forming the Proposed Development would be removed from the Site (with the exception of landscaping planting). The site is designed to then re-establish into agricultural use.
- 6.57 A site restoration and soils management plan would be submitted for the Council's approval prior to decommissioning works commencing. This can be secured by planning condition.
- 6.58 Having regard to the above it can be concluded that the effects of the Proposed Development would be temporary and entirely reversible. This attracts weight in favour of permission being granted albeit **limited** weight.

Relevant Appeal Decisions

- 6.59 There are a number recent examples of similar projects in Green Belt and countryside locations where Local Planning Authorities as well as Planning Inspectors have afforded significant weight to the contribution which BESS projects would make to meeting the identified need for such infrastructure, the contribution to maximising the utilisation of

electricity generated from renewable sources and the contribution to meeting climate change objectives. Decisions also acknowledge the need for BESS to be located in reasonable proximity to the defined point of connection to the electricity grid for both technical and commercial reasons.

6.60 The relevant appeals presented below are not intended to be exhaustive.

Land at Minchens Lane, Bramley, Hampshire (Appeal Ref: APP/H1705/W/21/389603)

6.61 Planning permission was granted for the development of a BESS within the open countryside (2023) with the Inspector concluding:

*“Battery storage facilities are a key component in the energy facilities of the country, being able to store excess electricity generated by renewable energy facilities when demand is low and release that energy to the grid at periods of high demand or when electricity generated by renewable sources is low. It is also clear that the country needs more electricity storage facilities in order to balance demand without resorting to fossil fuel generation. **I give substantial weight to this need.**”*

(Para 28 – emphasis added)

*“Locational factors that influence the siting of battery storage facilities include the provision of access to unrestricted network capacity, proximity to a financially viable access to the national grid, availability of suitable land and the proximity of a point of access to the highway network.the appeal site has all these features and therefore in these respects make it a suitable location for a battery storage facility. **I give substantial weight to these locational factors**”*

(Para 31– emphasis added)

Land South of Monk Fryston Substation, Selby (Appeal Ref: APP/N2739/W/22/3290256)

6.62 Planning permission was granted for development of a BESS within the Green Belt (2022) with the Inspector drawing the following conclusions:

“The current national position on energy supply is in favour of positive development, and more so in light of international events. The need for a more diverse energy system is becoming more apparent.”

(Para 25)

*“Energy storage is seen as a significant part of the strategy, and battery units such as this are seen as positive in terms of being renewable and produce negligible emissions in line with commitments with regard to Net-Zero emissions. **As a result significant weight can be attached to this matter.**”*

(Para 26 – emphasis added)

*“It is also apparent that that there is a clear and pressing need to address the energy strategy issues facing the country, hence the need for the proposal (para 31) [...] **These considerations, collectively, carry great weight and I conclude that they amount to***

very special circumstances sufficient to outweigh the harm to the Green Belt by reason of inappropriateness and the effect on openness.”

(Para 32 – emphasis added)

Little Holt, Hook (Appeal Ref: APP/N1730/W/17/3167123)

- 6.63 Planning permission was granted for a BESS (2017) within the open countryside with the Inspector concluding:

*“I give **significant weight** to the purpose of the development and the more recent policies in the Framework with which it would accord. These include one of the Framework’s core principles, that planning should support the transition to a low carbon future in changing climate, and that decisions should recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.”*

(Para 12 – emphasis added)

Land West of Wolverhampton, South Staffordshire (Appeal Ref: APP/C3430/W/22/3292837)

- 6.64 Planning permission granted for a BESS (50MW) within the Green Belt (2022) with the Inspector drawing the following conclusions:

*“The policy support for renewable development and associated development given in the Framework is caveated by the need for the impacts to be acceptable or capable of being made so. Nevertheless, the energy storage benefit of the proposal must be accorded **substantial weight**.”*

(Para 14 – emphasis added)

“Additionally, whilst the proposed development would be located at the site for a number of years, it is reversible and capable of being removed from the site.”

(Para 17)

“Therefore, in my judgement the environmental benefits of the proposal and the fact that the impacts can be made acceptable are sufficient to outweigh the harm to the Green Belt. Consequently, the very special circumstances necessary to justify the proposal do exist...”

(Para 18)

Land at Rawfield Lane, Fairburn, Selby (Appeal Ref: APP/N2739/W/22/3300623)

- 6.65 Planning permission granted for a BESS within the Green Belt (2022) with the Inspector making the following observations:

*“The Future Energy Scenarios Report 2022 updates the requirement for battery storage capacity from 13GW in the 2021 Future Energy Scenarios Report to 20GW by 2030. Hence I give the need for the equipment **very significant weight**.”*

(Para 29 – emphasis added)

"I acknowledge that this is not in itself a renewable energy project and therefore paragraph 151 of the Framework does not apply. However, without the move to renewable energy generation there would not be a need for the development due to the inherent vagaries of harnessing energy through renewable technology [...] I am satisfied therefore that the proposal would support the transition to a low carbon future in a changing climate through supporting renewable and low carbon energy and associated infrastructure in accordance with paragraph 12 of the Framework."

(Para 137 – emphasis added)

*"I give **very substantial weight to the lack of alternative sites** to deliver the high level of benefits, most importantly, in the required time frame to help to deliver the National Grid and UK's ambitious net zero targets."*

(Para 38 – emphasis added)

Land at Park Farm, Gillingham (Appeal Ref: APP/D1265/W/22/3300299)

- 6.66 Planning permission granted for development of BESS on land within the countryside. In approving the development, the Inspector formed the following views on the weight to be attached to the contribution which the scheme would make to meet the national need for such infrastructure:

*"For many years there have been a series of policies, statements and legal obligations which all seek to encourage renewable energy developments where they are appropriate [...] It is clear that decarbonisation will rely very heavily on wind and solar power projects, and that the national need is significantly greater than the capacity of current projects. **In light of the local and national imperative summarised above related to the provision of renewable energy, this matter weighs very heavily in favour of the proposal.**"*

(Para 92 and 93)

Green Belt Assessment: Planning Balance

- 6.67 Having identified the appropriate policies in the development plan, along with other relevant material considerations, including the Framework and emerging PfE, the decision maker is required to make a decision about whether there are very special circumstances justifying the grant of planning permission for the development. This requires an assessment of the weight to be afforded to each of the issues to determine where the overall balance lies, applying the NPPF 147/148 and section 38(6) PCPA 2004 overall.
- 6.68 The development comprises inappropriate development in the Green Belt. It would result in a loss of openness and encroachment into the open countryside; this is to be afforded **substantial weight**.
- 6.69 There would be moderate harm to the purposes of Green Belt by reason of unrestricted sprawl and the purposes of safeguarding the countryside from encroachment. This also attracts **substantial weight**.

- 6.70 There would be a low degree of harm to the setting and significance of a non-designated heritage asset which attracts **limited weight**.
- 6.71 Once the proposed landscape planting within the site matures the harm to landscape character, features and visual amenity would range from negligible to moderate adverse and would not be significant. This harm attracts **moderate weight**.
- 6.72 In order for VSC to exist, the totality of any harm identified must be clearly outweighed by the benefits/material considerations supporting the Proposed Development.
- 6.73 The weight to be attributed to the VSC is as follows: The contribution of the Proposed Development to meeting the national need for BESS attracts **substantial weight**; the contribution to addressing Climate Change / Emergency objectives also carries **substantial weight**. The absence of alternative sites located outside the Green Belt similarly attracts **substantial weight**. The contribution to enhancement of biodiversity carries **moderate weight** and the contribution to enhancement of local landscape character carries **limited weight**. That the development is temporary and reversible also carries **limited weight**
- 6.74 As noted above, many of the benefits which would arise from the Proposed Development would be significant and attract substantial weight in their own right. When combined, the package of benefits /VSC demonstrably and significantly outweighs the harm to the Green Belt and other harms such that the policy tests of Paragraph 148 of the NPPF and CS Policy G4 of the adopted Development Plan are met.

7. Technical / Environmental Considerations

- 7.1 This section summarises the results of various assessments which have been undertaken to understand the potential impact of the Proposed Development on relevant technical and environmental receptors and the degree to which any residual effects are consistent with or in conflict with the policies of the adopted / emerging development plan, the NPPF and other material considerations.

Sustainability

- 7.2 The Sustainability & Energy Statement ('SES') (prepared by Turley Sustainability) confirms that the Proposed Development will provide essential balancing services and decarbonisation to the National Grid.
- 7.3 The proposed BESS will be sufficient to provide electricity to approximately 20,000 homes for up to 2 hours, with GHG savings in the first year of circa 4,116 tCO₂e forecast, equivalent to taking 2,225 cars off UK roads. Over the lifetime of the project a total of 21,088 tCO₂e will be saved. The SES clarifies that whilst GHG savings will reduce year on year as the national grid decarbonises, this estimate excludes further GHG savings from the Proposed Development that will result from reducing renewable energy curtailment.
- 7.4 The Proposed Development is demonstrated to comprise sustainable development in line with national and local policy objectives and Committee on Climate Change recommendations and as a result should be approved in accordance with CS Policy SD1.

Landscape and Visual Impact

- 7.5 A Landscape Visual Impact Assessment ('LVIA') (Dated June 2023) has been prepared by Turley LVIA and assesses the effect of the Proposed Development on the landscape and visual receptors of the site and its surroundings.
- 7.6 The LVIA acknowledges that the Proposed Development would result in the loss of an existing agricultural land and a localised increase in urbanising influences within an area which currently comprises small pastoral fields with scattered built form, pylons and overhead powerlines. However, the LVIA recognises that features of the Proposed Development, such as the barn structures and new tree planting will provide screening and mitigate potential visual effects. As the vegetation establishes and matures, views of built form would become more filtered and visually integrate with the existing landscape.
- 7.7 The LVIA identifies that the Proposed Development would result in a **low** magnitude of change (adverse) to the landscape character of the wider area upon completion of construction which would reduce to **very low** after 15 years with maturation of the proposed landscape planting. Whilst the development would result in a **high** magnitude of change to the landscape character of the site itself initially this would reduce to **medium-high** after 15 years (neutral) and the establishment of planting. The effects of the development on the landscape fabric of the site would result in a **low** magnitude of change (adverse) on completion of the development. However, upon

maturation of the landscape planting over 15 years some **beneficial effects** would be realised.

- 7.8 In overall terms the effects to landscape character and fabric would range from minor-moderate adverse after 15 years and would not be significant.
- 7.9 The effects of the Proposed Development to visual amenity have also been assessed from a number of viewpoints. Upon completion of development the effects would range from **low- medium adverse** (i.e., from nearby PROW and adjacent highways) Upon maturation of the proposed landscape planting the effects would reduce to **negligible - low adverse**.
- 7.10 In overall terms there would be no significant effects to visual amenity.
- 7.11 In consideration of the above, the Proposed Development is considered to comply with paragraph 174(a) of the Framework and UDP Policy NE/6.

Heritage

- 7.12 This application is supported by a Heritage Statement (dated July 2023) prepared by Turley which assesses the significance of the nearby non-designated heritage asset and the impact of the Proposed Development on that significance.
- 7.13 Scott House, to the north of the Site has been identified as a Non-Designated Heritage Asset and is also recorded on the Greater Manchester Historic Environment Record (HER) (MGM16861).
- 7.14 The assessment confirms that the Site makes a contribution to the setting of Scott House, albeit relatively limited and forming part of a wider area.
- 7.15 The Proposed Development will introduce a form of built development that does not currently exist within the rural landscape setting; therefore, it is concluded that there would be a low degree of harm to the significance of the asset.
- 7.16 The NPPF clearly differentiates between designated and non-designated heritage assets and the proportionate way they should be addressed in the planning process. The impact of the development of existing open land in the form proposed and within the agricultural setting of the non-designated heritage asset should be taken into consideration.
- 7.17 Whilst it is acknowledged that the Proposed Development will have harm on the non-designated heritage asset, NPPF Paragraph 203 is a material consideration to be given limited weight and to be proportionately addressed by Rochdale Council in the planning balance.

Noise Pollution

- 7.18 A Noise Impact Assessment ('NIA') is submitted in support of this application, prepared by Miller Goodall (14 July 2023).
- 7.19 Miller Goodall carried out unattended surveys to record the background sound level on 11th May 2023 and on 15th May 2023.

- 7.20 In order to safeguard the amenity of nearby sensitive receptors and ensure that any impact would be 'low' noise rating limits have been set in line with BS 4142:2014+A1:2019. These are 33dB at the nearest noise sensitive receptor.
- 7.20 These limits can be secured and controlled through the use of conventional planning conditions and would prevent the Proposed Development adversely affecting the amenity of nearby existing and future properties. Adherence with these limits and the terms of the condition would ensure that the Proposed Development complies with the provisions of paragraph 174(e) and 185(a) of the Framework and CS Policy DM1, G6 and C6.

Transport and Access

- 7.21 This application is supported by a Transport Statement prepared by Curtins to assess the potential impact of the Proposed Development on the surrounding area from a traffic and transportation perspective. The Transport Statement confirms that:
- The additional movements associated with the Proposed Development will be extremely minimal and infrequent and not constitute a significant increase in the likelihood of collision.
 - The impact on Clay Lane is considered to be negligible and on a worst-case day there would only be a maximum of 8 staff arrivals and 8 staff departures, plus a couple of HGV movements.
 - The impact on Furbarn Road is considered to be negligible as traffic flows are currently very low with site visits suggesting no vehicles on the road for long periods of time.
- 7.22 On the basis of the traffic analyses undertaken and the mitigation identified, there would be no unacceptable impact on highway safety, nor would the residual cumulative impacts on the road network be severe.
- 7.23 It is therefore concluded there are no transport or highway related reasons which should preclude planning permission being granted. The Proposed Development is compliant with paragraphs 111 of the Framework and CS Policy T2.

Ecology

- 7.24 This application is supported by a Ecological Survey and Assessment prepared by ERAP which has been informed by a Phase 1 Habitat Survey. This concludes that adverse effects on protected species will be avoided and measures for Priority Species, particularly bird species, will be accommodated by the proposals and landscape planting.
- 7.25 Furthermore, the report states that in order to secure the longevity of the landscape and habitat creation works, it is recommended that a Landscape Ecological Management Plan, including a work schedule, is prepared and applied. This recommendation can be secured by condition.
- 7.26 The assessment further concludes that the proposals will secure an opportunity to implement beneficial measures such as habitat creation that will conserve and enhance

habitats for wildlife such as birds and bats, with the aim of providing gains for biodiversity in accordance with the principles of the Framework and CS Policy G7.

- 7.27 The accompanying BNG assessment confirms that the Proposed Development can demonstrate no net loss in biodiversity at area-based habitats and a significant net gain for biodiversity at hedgerow / linear-based.

Arboriculture

- 7.28 An Arboricultural Impact Assessment ('AIA') has been submitted to accompany the application, prepared by ACS Consulting (June 2023) to inform the Proposed Development on the quality of trees on site.
- 7.29 The AIA confirms that the development retains the Site's principal arboreal features. The proposal, in terms of trees, does not result in the unacceptable loss or harm to features of landscape importance or amenity value.
- 7.30 Furthermore, the Proposed Development incorporates additional tree planting to screen views of the scheme. This will also provide landscape / general amenity value. The Proposed Development is compliant with paragraphs 131 and 174(b) of the Framework and CS Policy G1 and G6.

Flood Risk and Drainage

- 7.31 Design and Access Statement ('DAS') includes a Drainage Statement which has submitted to accompany the application, prepared by Pye Design (June 2023).
- 7.32 The DAS states that the existing site is naturally drained, therefore the Proposed Development will continue this approach with no new connections to the mains surface water system.
- 7.33 Rainwater collected on the new pitched roof barn structures will be directed to the ground level through rainwater pipes and allowed to naturally soak away. The floor inside the barn structures will be made of permeable stone, rather than a concrete slab. All new roadways and stone surfaces within the site will be designed to be fully permeable.
- 7.34 Any rainwater that comes into contact with the top of the battery units, inverters, substation, or ancillary unit will simply fall to the ground and naturally permeate through the permeable surfaces.
- 7.35 The proposed project will not produce any foul waste, eliminating the need for foul drainage connections on the site. The Proposed Development is compliant with CS Policies C6, G6 and G8.

Loss of Agricultural Land

- 7.36 National and local policies aim to protect the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals. The NPPF states that "*where significant development of agricultural land is*

demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality”⁴⁵.

- 7.37 Whilst there is no definition within the NPPF of what constitutes ‘significant development’, Schedule 4(y) of the Town and Country Planning (Development Management Procedure (England) Order) (DMPO) 2015 confirms that LPAs “*must consult Natural England on all non-agricultural applications that result in the loss of more than 20 hectares (ha) of BMV land if the land is not included in a development plan.*”
- 7.38 The Site comprises 0.69 hectares of Grade 3b (moderate quality) agricultural land and is not BMV. There is no conflict with the provisions of the NPPF, therefore. Furthermore, it is to be noted that the Proposed Development will be temporary (30 years) with the batteries and associated infrastructure to be removed from the site at the end of this period and the site reinstated.

Summary and Conclusion

- 7.39 The review of technical assessments presented above confirms that the scheme has been sensitively designed with any residual effects to identified receptors having been minimised in so far as possible and well within established thresholds of acceptability. There are no technical or environmental considerations which would weight against a grant of planning permission.

⁴⁵ Paragraph 174(b) footnote 58

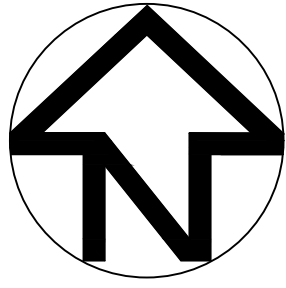
8. Summary and Conclusions

- 8.1 This Planning Statement has been prepared by Turley on behalf of Shaw Energi to support a full planning application for a battery energy storage system (BESS) with associated infrastructure and landscaping.
- 8.2 The national need for BESS storage projects is comprehensively expressed within a wide range of Governmental policy documents and strategies as well as those produced by other organisations such as National Grid. They are considered an essential component in the strategy to meet climate change objectives, reducing the costs of electricity and in increasing levels of national energy security.
- 8.3 BESS assist in achieving these objectives in a number of ways including:
- By storing electricity during periods of high generation and low demand and rapidly releasing it back on to the network during periods of high demand and low generation they provide essential grid-balancing services preventing black outs and brown outs.
 - By balancing supply and demand they also allow the use of electricity generated from renewable sources to be maximised. In some situations, generation capacity from renewable sources currently has to be curtailed or ‘turned down’ due to insufficient capacity within the network.
 - By creating storage capacity within the network, BESS allow renewable sources of supply to come on stream more quickly rather than having to wait for upgrades to or investment in transmission and distribution infrastructure which can take a number of months / years to be designed, consented, and constructed. By helping to avoid or defer very expensive investment in grid infrastructure BESS can also play a part of lowering energy bills for consumers
 - By supporting the decentralisation of the transmission and distribution grid thereby facilitating less dependence on fossil fuel-based sources of suppl. This in turn has a cumulative effect on reducing CO2 emissions.
- 8.4 The proposed BESS scheme is designed to store 57MW within the batteries on a 2-hour system and will contribute to the realisation of these national strategic objectives.
- 8.5 It is acknowledged that the Proposed Development would be located within the Green Belt. It is also recognised that the development would cause definitional harm, harm to the openness of the Green Belt and harm to some Green Belt purposes. A degree of harm to landscape character, visual amenity and the setting of a non-designated heritage asset has also been acknowledged.
- 8.6 These ‘harms’ are however demonstrably outweighed by the package of Very Special Circumstances case advanced in favour of the application such that the application is compliant with policies within the Development Plan and NPPF relating to development within the Green Belt. These VSC include the contribution which the development would make to meeting the need for BESS and the decarbonisation of the

economy and the absence of sites located outside the Green Belt which can accommodate the Proposed Development. Over the lifetime of the project a total of 21,088 tCO₂e will be saved.

- 8.7 The importance of BESS to achieving climate change objectives has been recognised in a number of recent and relevant appeal decisions where planning permission has been granted for BESS within the Green Belt and open countryside locations with the weight being attached to considerations such as need for BESS, contribution to reducing in greenhouse gas emissions and the absence of alternative sites all being awarded significant weight in the planning balance.
- 8.8 The suite of documentation which accompanies the application demonstrates that the Proposed Development has been designed sensitively seeking to avoid harm in the first instance and where this is not possible minimise harm through appropriate design and mitigation. The technical assessments confirm that any harm arising from the development would be localised and limited and is well within established thresholds of acceptability.
- 8.9 Having regard to the above it is considered that the Proposed Development is compliant with the Development Plan when read as a whole and with the NPPF. There are no other policies in the Framework that protect areas or assets of particular importance that would provide a reason for refusing the development proposed. Any adverse impacts of granting permission do not significantly and demonstrably outweigh the benefits, when assessed against policies in the Framework taken as a whole.
- 8.10 In accordance with Paragraph 11 of the Framework and Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning permission should be approved without delay.

Appendix 1: Site Location Plan



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PROJECT

57MW BATTERY ENERGY STORAGE DEVELOPMENT

CLIENT

SHAW-ENERGI LTD.

DRAWING TITLE

LOCATION PLAN

PURPOSE OF ISSUE

PLANNING APPLICATION

DRAWN BY
ARP

CHECKED BY
IP

DATE	May 2023
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SCALE (@ A1)
1:1250

PROJECT NUMBER	4130
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DRAWING NUMBER
4130-P-501

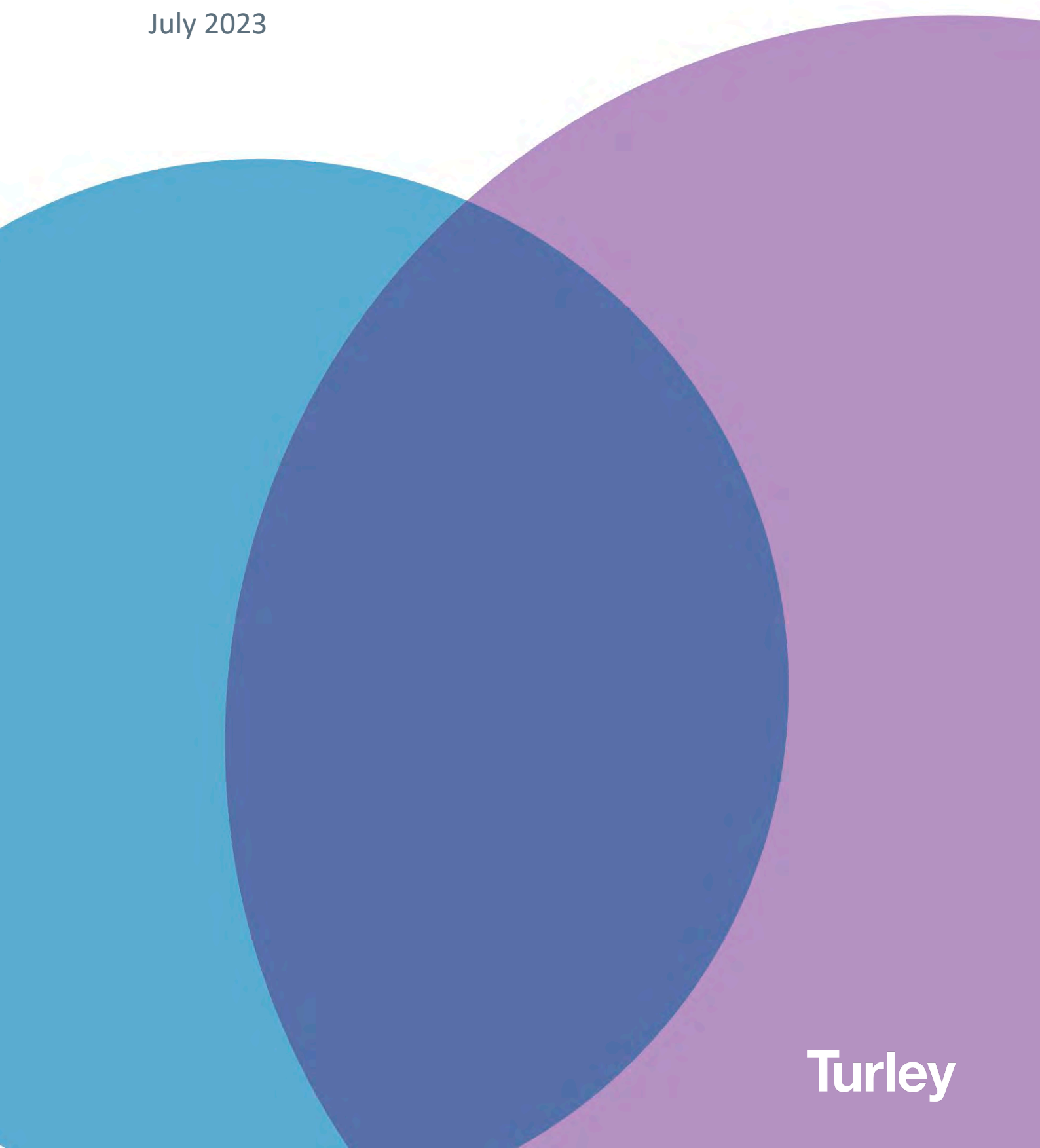
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Appendix 2: Alternative Sites Assessment

Alternative Sites Assessment

Clay Lane

July 2023



Turley

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Contact

Rebecca Boston
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July 2023

1. Introduction

- 1.1 This Alternative Site Assessment (ASA) has been prepared to accompany a full planning application to Rochdale Borough Council ('RBC') for the proposed installation of a Battery Energy Storage System (BESS) and associated infrastructure ('the Proposed Development') on land bounded by The Rake, Lower Jowkin Lane and Furbarn Road, Rochdale and its connection to the Rochdale 275kV Substation (situated at NGR: SD858139).
- 1.2 The purpose of the report is to demonstrate that there are no alternative sites¹ available located outside the Green Belt and within a reasonable distance of the defined point of connection to the electricity network which are capable of accommodating the Proposed Development. This will include a detailed explanation of the methodology which has been used to appraise the suitability of potential alternative sites.

¹ Brownfield sites within the urban area, other sites situated outside the Green Belt and other sites located within the Green Belt.

2. The Proposed Development

2.1 A detailed description of the proposed development is presented within the Planning Statement. In summary it would comprise the following components:

- 2 no. “barn structures” to house battery units and invertors
- 15 no. powerpack battery units
- 8 no. invertors
- 1 no. ancillary unit
- 1 no. substation building
- Vehicular access from Lower Jowkin Lane
- 2.5m high green mesh security gates and fencing
- Access track for maintenance vehicles
- Areas of new landscape planting.
- Underground cable connection to the National Grid Substation at Clay Lane.

2.2 A formal grid connection offer has been secured by Shaw Energi from National Grid ESO to connect the Proposed Development to the substation at Clay Lane The project is therefore deliverable.

2.3 Securing a grid connection offer can be one of the most challenging aspects in the delivery of any BESS project as there are a limited number of locations within the grid network which have available capacity. A BESS project requires both an import and export connection and, as is explained further below, reasonable proximity to the point of connection to the electricity network is essential.

3. Relevant Planning Policy

- 3.1 A detailed review of relevant planning policy is presented within the Planning Statement (which is the parent document to this Appendix).
- 3.2 Draft NPS EN1 is a material consideration in the determination of the application. It is supportive of the development of BESS projects in principle. The document confirms that storage has a key role to play in achieving net zero and providing flexibility to the energy system so that high volumes of low carbon power energy, heat and transport can be integrated. Storage is also needed to reduce the costs of the electricity system and to provide services locally and at the national level. These include maximising the usable output from intermittent low carbon generation (e.g., solar and wind), reducing the total amount of fossil-fuel based generation capacity on the network, providing a range of balancing services to the National Electricity Transmission System Operator and District Network Operators to help operate the system; reducing constraints on the networks, in turn helping to defer to avoid the need for costly network upgrades as demand increases².
- 3.3 As is explained within the Planning Statement there are now a significant number of other national documents and strategies which recognise the importance of energy storage and the role it can play in realising national objectives around decarbonisation and climate change.
- 3.4 The Planning Act 2008 treats battery storage as a form of energy. Furthermore, the Government is currently legislating to clarify that electricity storage is a distinct sub-set of electricity generation in the 1989 Electricity Act. The NPPF confirms that the wider environmental benefits associated with the increased production of energy from renewable sources can form part of the very special circumstances case needed to justify development within the Green Belt (see below)

² Draft NPS EN1, paragraphs 3.3.24 to 3.3.26

4. Purpose of the Report

- 4.1 The application site is located within the Green Belt. National and Local Planning Policy presumes against inappropriate development in the Green Belt unless the harm to the openness of the Green Belt and other harm is outweighed by very special circumstances. The absence of an alternative sites located outside the Green Belt within a reasonable distance of the defined point of connection and capable of accommodating the Proposed Development can form a 'very special circumstance' either on its own or in combination with a wider package of considerations, as is the case with the submitted application.
- 4.2 The purpose of the report is to demonstrate that there are no alternatives sites located outside the Green Belt which are located within a reasonable distance of the defined point of connection to the electricity network³ and which are available, suitable and capable of accommodating the Proposed Development
- 4.3 There is no requirement within national or local planning policy for applications for BESS within the Green Belt be accompanied by an assessment of alternative sites outside the Green Belt⁴.

³ Defined as a maximum of 2km.

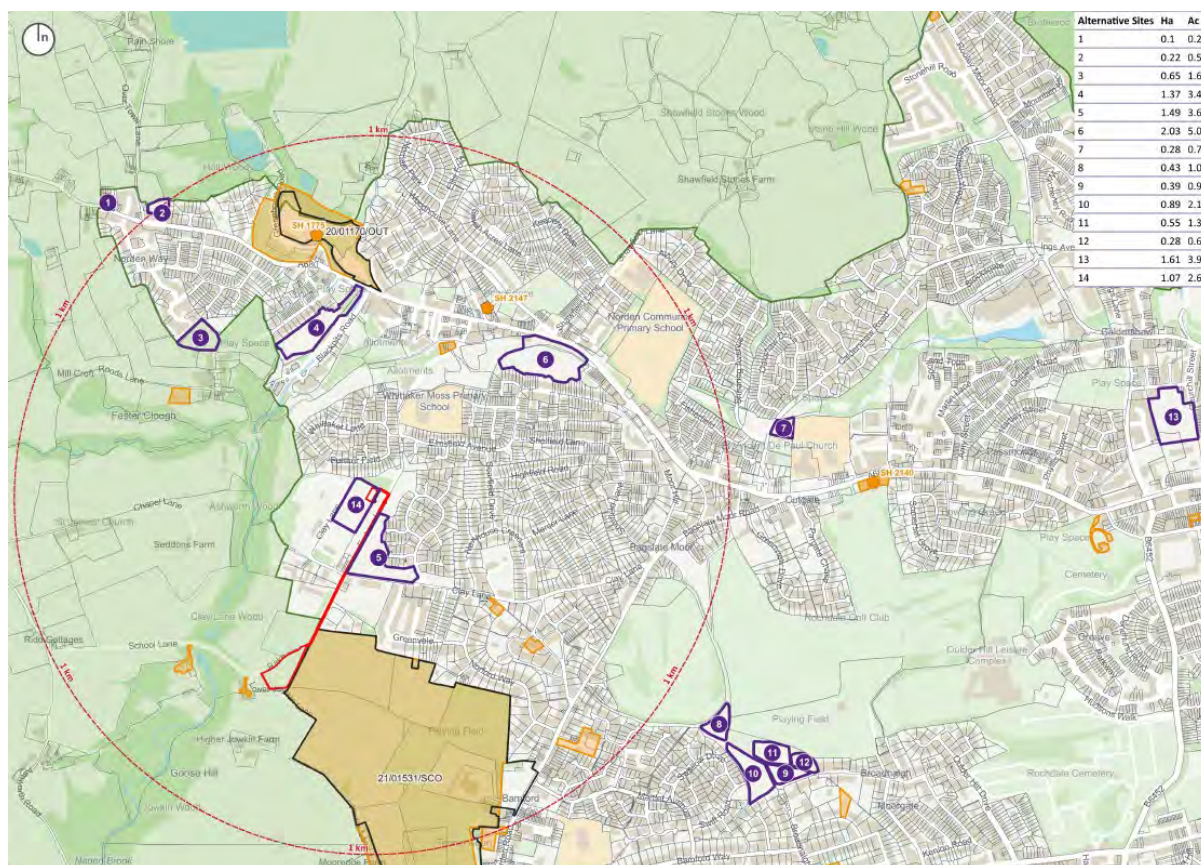
⁴ Within the NPPF, PPG or the adopted Development Plan.

5. Assessment Methodology

- 5.1 As noted above, Shaw Energi has secured an offer from National Grid ESO to connect the Proposed Development to the Rochdale Substation.
- 5.2 The application site has been selected due to its ability to accommodate the Proposed Development and because of its very close proximity to the Rochdale Substation (c 0.4km).
- 5.3 Minimising the distance between a BESS and the identified point of network connection is a key element of BESS developments.
- 5.4 Connection distances of greater than 2km are generally considered to be technically infeasible and commercially unviable. This is due to the high costs associated with the necessary electrical cabling needed to connect the BESS to the electricity network (this being one of the most expensive components of any scheme), the scale of transmission losses⁵ (these being higher the further that electricity travels between two points), the general disturbance caused during cable installation (this requiring periods of road closure) and the additional carbon footprint associated with construction of the development.
- 5.5 Having regard to the above, a 2km site search area centred on the Rochdale Substation has been defined.
- 5.6 The application site, the Rochdale Substation, the 2km search area and individual vacant sites identified are shown in Figure 5.1 below (reproduced at larger scale in **Appendix 1**).

⁵ When electrical currents travel on a network some energy is dissipated in the form of heat and is 'lost' due to the electrical resistance in a network.

Figure 5.1: Alternative Sites Assessment Map (site outlined in red)



Process of Identifying Sites

5.7 The identification and assessment of potential alternative sites was undertaken in a series of stages:

Stage 1

5.8 Define the 2km 'search area' around the grid connection point at Rochdale Substation.

Stage 2

5.9 Utilising web-based resources such as MagicMap, a constraints map was generated identifying all constraints within the 2km search area (**Appendix 2**).

5.10 This identified constraints including Green Belt designations, site specific local plan allocations, national / local nature conservation sites, listed buildings, conservation areas, scheduled ancient monuments, registered parks / gardens, historic landfill sites, flood zone categorisation.

5.11 Where appropriate, land affected by such designations was excluded from further consideration.

Stage 3

5.12 Vacant sites (minimum 0.7 hectares) situated within the urban area and within 2km of the defined point of connection were identified.

- 5.13 Other sites located within the Green Belt within the 2km area of search were excluded from consideration, due to them being of the same status as the application site and benefitting from no advantage in planning policy terms.
- 5.14 Sites were tested against a series of technical and environmental criteria as identified in Table 1 below. Only sites meeting all relevant criteria were progressed to Stage 4, land-owner identification and negotiation.

Stage 4

- 5.15 Sites identified as being technically suitable were subject to land registry searches to identify individual owners. Each relevant landowner was contacted individually by letter.

6. Site Requirements

6.1 **Table 1** below provides the site criteria and justification for each of the criteria.

Table 1: Site Criteria and Justification

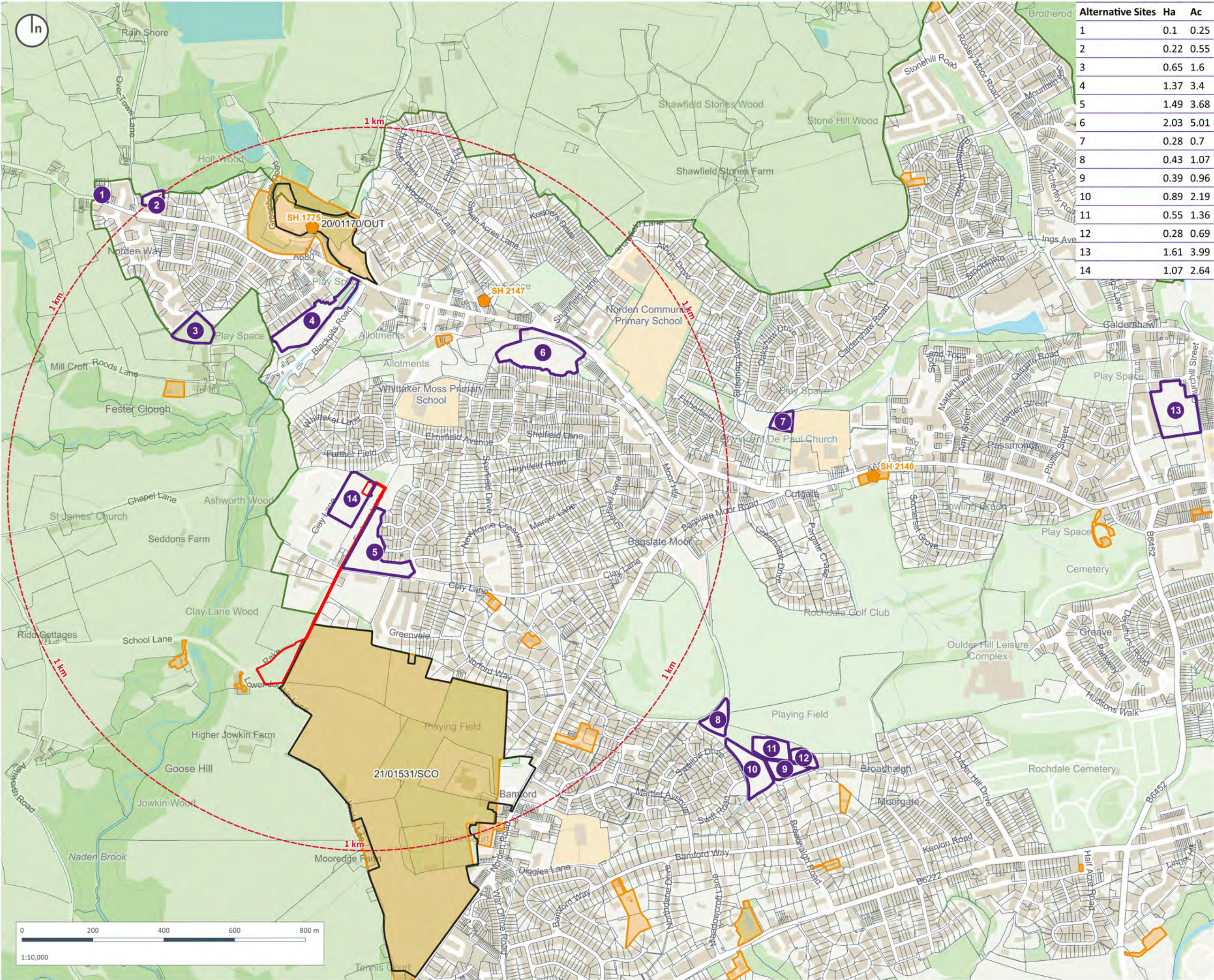
Site Criteria	Justification
Site Size and Configuration	Minimum site area of 0.7 hectares required to accommodate proposed development. Sites must have a uniform shape (i.e., square or rectangular).
Distance to point of grid connection	Sites located more than 2 km from the point of grid connection should be discounted. This is due to the cost of electrical cabling and the objective of minimising transmission losses. The 2km range applies where there is no physical impediment which prevents a direct or near direct cable routing from the site to the point of connection. Sites located closer than 2km may be considered technically infeasible or unviable if there are physical or land ownership constraints which cannot be overcome. Site located within 2km may also be discounted where the length to cable connection materially exceeds 2km.
Grid connection route	Sites which can be connected to the electricity grid via underground cabling beneath the public highway preferred to sites requiring cable route to be taken across additional third-party land.
Land Use allocation	Sites allocated for other forms of development in either the adopted or emerging development plan should be discounted.
Utilities	Sites containing underground utilities or above ground power lines which due to their extent / configuration materially compromise scheme design and / or are incapable of diversion (technically / financially) should be discounted.
Highways and Road Infrastructure	Appropriate highway infrastructure is required due to the use of HGV's during the construction period which require weak bridges, and roads within steep gradients to be avoided.
Site Access	Site should benefit from an existing vehicular access or demonstrated to be capable of accommodating such an access for construction and operational traffic.
European and National Nature Conservation Designations	Sites containing a designated Natura 2000 or Ramsar site or SSSI should be discounted. Sites located outside such designations but requiring a grid connection across / through designations should also be discounted.

Non statutory nature conservation sites	Sites containing a Local Wildlife Site / SBI should be discounted. Sites located outside such designations but requiring a grid connection across / through designations should be discounted.
Scheduled Ancient Monuments	Sites containing a scheduled ancient monument should be discounted. Sites located outside such designations but requiring a grid connection across / through designations should also be discounted.
Conservation Areas	Sites located within Conservation Areas should be discounted.
Listed Buildings	Sites located within c100 metres of a Listed Building should be discounted.
National Landscape Designations	Sites within National Parks or AONB's should be discounted.
Public Rights of Way	Sites containing public rights of way should be discounted.
Agricultural Land	Sites of ALC Grades 1,2, 3a should be discounted.
Flood Risk	Sites within Flood Risk Zones 2 and 3 should be discounted.
Ownership / Availability	In the event that a site meets each of the above-mentioned criteria, the relevant landowner should be identified through reference to land registry records and approached via letter. If landowners fail to engage within 28 days or indicate that there are not interested the site should be considered unavailable and discounted from further consideration. If the landowners indicate interest, commercial terms should be shared, and negotiations undertaken. A key consideration is the length of lease: a minimum term of 30 years with provision for re-energisation of the site is required. If this is not possible the site should be considered unavailable.

7. Conclusion

- 7.1 The Alternative Site Assessment has followed a staged process whereby individual sites located within the defined urban area and within 2km of the Rochdale Substation (which is the identified point of connection to the electricity network) have been identified and assessed against pre-defined criteria.
- 7.2 The assessment process initially identified 14 vacant sites within the search area. Of these, 7 sites were discounted immediately on the basis of the total land area being below the minimum 0.7 hectares required to support the Proposed Development. These sites were not subject to testing against the remaining criteria as they were clearly unsuitable and unable to accommodate the development.
- 7.3 A further site, land within the Rochdale Substation (Alternative Site ref. 14) – the facility to which the Proposed Development would be connected - was also discounted on the basis of the prevailing constraints to ownership, relationship to existing operational assets and the future operational requirements of the site owner. A letter confirming the unavailability of the site from Electricity North West is attached at **Appendix 5**.
- 7.4 The remaining sites were then tested against the detailed criteria specified in Table 1. **Appendix 3** has the complete proformas of the remaining sites which were tested, **Appendix 4** has site visit pictures which were taken 09 March 2023. None are suitable for accommodating the proposed development for either one or more the following reasons:
- The distance of the grid connection route between the site and the Rochdale Sub Station exceeding 2km.
 - The developable area being below the 0.7 hectares minimum requirement when various constraints are factored into consideration.
 - Proximity to listed buildings.
 - The location of parts of sites within Flood Risk Zone 3.
 - The location of whole or parts of sites within the Green Network (as defined within the Allocations Plan of the CS).
 - The presence of public rights of way / footpaths within sites which precludes the creation of a safe and secure development.
- 7.5 Considering the above, it is concluded that there are **no sites** located outside the Green Belt within 2km of the identified point of grid connection which are suitable for and capable of accommodating the Proposed Development.

Appendix 1: Alternative Sites Assessment Map



Alternative Sites	Ha	Ac
1	0.1	0.25
2	0.22	0.55
3	0.65	1.6
4	1.37	3.4
5	1.49	3.68
6	2.03	5.01
7	0.28	0.7
8	0.43	1.07
9	0.39	0.96
10	0.89	2.19
11	0.55	1.36
12	0.28	0.69
13	1.61	3.99
14	1.07	2.64

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Site

Allocations

Cumulative Scheme

Green belt 2021-22

CLIENT:
Shaw Energi

PROJECT:
Clay Lane / Furbarn Road, Rochdale

DRAWING:
Alternative Sites

PROJECT NUMBER:
SHAM3000

DRAWING NUMBER:
GIS_102

CHECKED BY:
MW

REVISION:
1.3

STATUS:
Draft

DATE:
Jan 2023

SCALE:
1:10,000 @ A3

Appendix 2: Constraints Map

Appendix 3: Alternative Sites Assessment Proformas (Stage 2)

Alternative Site ref. 4 – Land east of Naden Brook and south of Hutchinson Road, OL11 5TX



Criterion Number	Criterion	Assessment
1	Site area / configuration	The site is 1.37 ha and of linear shape. Topography is undulating. Half of the site is contained by mature trees and hedgerows, with residential properties adjacent to the north western boundary. The southern boundary is lined with trees and hedgerows. The total site is of sufficient size to accommodate the proposed development. However, the amount of land available for development having regard to constraints posed by trees, partial location within Flood Zone 3 and access is reduced to 0.6 hectares. The amount of developable land is insufficient to accommodate the development.
2 & 3	Distance to point of grid connection	The site is located adjacent to the adopted highway. A cable connection to the Rochdale Substation could be achieved by laying cable beneath the highway and without using third

Criterion Number	Criterion	Assessment
	and connection route	party land. The connection distance would be 2.4km which is in excess of the defined maximum.
4	Existing development or land use	The existing land use is agricultural.
5	Site allocation in adopted or emerging development plan	The Allocations Plan, which is currently in draft form, forms part of the Rochdale Core Strategy ('CS') (Adopted 2016) identifies the site as forming part of a Green Network. Policy G6 states that <i>"We will sustain and enhance a green network to support growth and regeneration in the borough and provide a high-quality environment that meets the needs of our community and visitors to the borough."</i>
6	Presence of underground/ above ground utilities which constrain development	N/A
7	Availability of local highway infrastructure to accommodate construction vehicles	The site is located immediately adjacent to A680, which would be accessible by HGVs and other construction vehicles.
8	Availability of existing vehicular access or ability to form suitable access	Vehicular access into and through the site would need to be created via Blackpits Road or Hutchinson Road.
9	Is the site within a national Nature Conservation Designation?	No
10	Is the site within a local Nature Conservation Sites?	As mentioned above, the site forms part of an identified Green Network, though the CS does not explicitly reference this as a local Nature Conservation Site.
11	Does the site contain a Scheduled Ancient Monument?	No.

Criterion Number	Criterion	Assessment
12	Is the site within a Conservation Area?	No.
13	Is the site within 100 metres of a Listed Building?	There are two Grade II Listed Building's located in close proximity to the Site, approximately c100m to the north of the Site is 22 and 24 Lower Tenterfield and c98m to the east is Church of Saint Paul.
14	Is the site within a National landscape designation?	No.
15	Does the site contain Public Rights of Way?	No.
16	Agricultural Land Classification (ALC) of the site.	The Natural England Agricultural Land Classification Map shows the site as being located in an area predominantly in urban use. The site is not given an ALC. http://publications.naturalengland.org.uk/file/127054
17	Flood Risk Classification of the site.	A proportion of the site, on the southern boundary adjacent Naden Brook and the western boundary adjacent the A680 is located within Flood Zone 3. Land within FZ3 would not be suitable in policy terms for the proposed development given the nature of the electrical infrastructure. The high flood risk categorisation may also cause challenges with respect to securing the necessary insurances for the project.
18	Site ownership / availability	Not assessed due to failure of site against other criteria.
	Conclusion	Site not suitable / capable of accommodating the Proposed Development due to constraints regarding tree coverage, ecological constraints (Green Network) and partial location within FZ3 rendering the site too small. The distance to point of grid connection also exceeds 2km .

Alternative Site ref. 5 – Land north of Clay Lane and east of Furbarn Road, OL11 5WD



Criterion Number	Criterion	Assessment
1	Site area / configuration	The site 1.49 ha and is L-shaped. Hedgerows and trees bound the site to the north and south, with residential properties adjacent to the north eastern boundary. Public Footpaths linking Clay Lane to the adjacent housing development cut across the site. Whilst the total site area is capable of accommodating the proposed development, the presence of trees / hedgerows and public footpaths would constrain the developable area available to 0.5 hectares.
2 & 3	Distance to point of grid connection and grid connection route	The site is located adjacent to the adopted highway. A cable connection to the Rochdale Substation could be achieved by placing the cable beneath the highway without using third party land. The connection distance would be 0.1km.
4	Existing development or land use	The land is open green space with a formal footpath dissecting through the middle towards the residential properties.
5	Site allocation in adopted or emerging development plan	The site is an allocated Local Urban Open Space; therefore, the land is a protected recreational open space. UDP Policy G/3 seeks to protect the land from development.

Criterion Number	Criterion	Assessment
6	Presence of underground/ above ground utilities which constrain development	N/A
7	Availability of local highway infrastructure to accommodate construction vehicles	The site is located adjacent to Clay Lane which appears suitable for accommodating likely construction vehicles including HGV.
8	Availability of existing vehicular access or ability to form suitable access	The creation of a vehicular access from Clay Lane appears feasible although tree removal and reconciliation of site levels would be needed. The feasibility of such would require further technical assessment.
9	Is the site within a national Nature Conservation Designation?	No.
10	Is the site within a local Nature Conservation Sites?	No.
11	Does the site contain a Scheduled Ancient Monument?	No.
12	Is the site within a Conservation Area?	No.
13	Is the site within 100 metres of a Listed Building?	No.
14	Is the site within a National landscape designation?	No.
15	Does the site contain Public Rights of Way?	There is a PROW footpath (ref. RocE Fp39) that begins at the junction of Clay Lane and Furbarn Lane.
16	Agricultural Land Classification (ALC) of the site.	The Natural England Agricultural Land Classification Map shows the site as being located in an area predominantly in urban use. The site is not given an ALC. http://publications.naturalengland.org.uk/file/127054

Criterion Number	Criterion	Assessment
17	Flood Risk Classification of the site.	The land is in flood zone 1 which means it has a low probability of flooding from rivers and the sea.
18	Site ownership / availability	Not assessed due to failure of site against other criteria.
Conclusion		Site assessed as being unsuitable for the proposed development due to constraints regarding tree coverage, public rights of way and allocation within the Core Strategy as a 'Local Urban Open Space'.

Alternative Site ref. 6 – Land south of Edenfield Road and west of Old Delph Road, OL11 5XQ



Criterion Number	Criterion	Assessment
1	Site area / configuration	The site is 2.03 ha and of irregular rectangular shape. Hedgerows and trees bound the site on all boundaries. There is also extensive tree coverage within the site. There are residential properties adjacent to the southern boundary. The site is of sufficient size to accommodate the proposed development. However, due to the extensive tree coverage the amount of area which is feasibly available for development is likely to be less than the 0.7-hectare requirement
2	Distance to point of grid connection & grid connection route	The site is located adjacent to the adopted highway. A cable connection to the Rochdale Substation could be achieved by placing the cable beneath the highway without using third party land. The connection distance would be 2.3km. This is in excess of the defined maximum.
4	Existing development or land use	The existing land is entirely covered by extensive tree coverage and recreation routes.
5	Site allocation in adopted or emerging development plan	The site is identified as forming part of a Green Network.

Criterion Number	Criterion	Assessment
6	Presence of underground/ above ground utilities which constrain development	N/A
7	Availability of local highway infrastructure to accommodate construction vehicles	The site is located adjacent to the A680 which appears suitable for accommodating likely construction vehicles including HGV.
8	Availability of existing vehicular access or ability to form suitable access	Access could be taken from Edenfield Road but would require significant tree clearance with associated arboriculture and ecological impacts.
9	Is the site within a national Nature Conservation Designation?	No.
10	Is the site within a local Nature Conservation Sites?	The Site is an allocated Green Network.
11	Does the site contain a Scheduled Ancient Monument?	No.
12	Is the site within a Conservation Area?	No.
13	Is the site within 100 metres of a Listed Building?	Adjacent to the site's northern boundary is a Grade II listed building (Norden War Memorial c.20m).
14	Is the site within a National landscape designation?	No.
15	Does the site contain Public Rights of Way?	There are two PROW footpaths which dissect the site (ref. RocE Fp33a and RocE Fp33). This would prevent the development of a safe and secure facility in accordance with health and safety requirements and commercial insurances.
16	Agricultural Land Classification (ALC) of the site.	The Natural England Agricultural Land Classification Map shows the site as being located in an area predominantly in urban use. The site is not given an ALC. http://publications.naturalengland.org.uk/file/127054

Criterion Number	Criterion	Assessment
17	Flood Risk Classification of the site.	The land is in flood zone 1 which means it has a low probability of flooding from rivers and the sea. A small proportion of the site on the western boundary is within FZ3 within which development would not be appropriate.
18	Site ownership / availability	Not assessed due to failure of site against other criteria
Conclusion		Site assessed to be unsuitable due to concerns over extent of developable area, likely requirement for extensive tree clearance, distance of grid connection route, presence within Green network, proximity to a listed building and presence of PROW through the site.

Alternative Site ref. 10 – Land west of Regency Court, OL11 5XD



Criterion Number	Criterion	Assessment
1	Site area / configuration	The site is 0.9 ha and of irregular pentagon shape. Hedgerows and residential properties bound the site to the west, open fields to the north and east, with further residential properties to the south. The site is of sufficient size to accommodate the proposed development.
2	Distance to point of grid connection	The site is located within 1.5 km of the Rochdale Sub-Station.
3	Grid connection route	Whilst the site is located within 1.5km of the Rochdale Substation a cable connection within the public highway of over 4km would be required. Following the adopted highway, the distance between the site and the Rochdale substation is 4km.
4	Existing development or land use	The land is agricultural with no existing development.
5	Site allocation in adopted or emerging development plan	The site is identified as forming part of a Green Network and Local Urban Open Space.

Criterion Number	Criterion	Assessment
6	Presence of underground/ above ground utilities which constrain development	N/A
7	Availability of local highway infrastructure to accommodate construction vehicles	The adopted highway would be able to accommodate construction vehicles.
8	Availability of existing vehicular access or ability to form suitable access	Access could be taken from Regency Court.
9	Is the site within a national Nature Conservation Designation?	No.
10	Is the site within a local Nature Conservation Sites?	The Site is an allocated Green Network.
11	Does the site contain a Scheduled Ancient Monument?	No.
12	Is the site within a Conservation Area?	No.
13	Is the site within 100 metres of a Listed Building?	Approximately 100m from the Site is a Grade II Listed Building (No. 15 Broadhalgh Avenue).
14	Is the site within a National landscape designation?	No.
15	Does the site contain Public Rights of Way?	The Site is entirely bound by bridleways (ref. RocE Bp8, RocE Bp9 and RocE Bp6a).
16	Agricultural Land Classification (ALC) of the site.	The Natural England Agricultural Land Classification Map shows the site as being located in an area predominantly in urban use. The site is not given an ALC. http://publications.naturalengland.org.uk/file/127054

Criterion Number	Criterion	Assessment
17	Flood Risk Classification of the site.	The land is in flood zone 1 which means it has a low probability of flooding from rivers and the sea.
18	Site ownership / availability	Not progressed as site assessed as being unsuitable for the proposed development due to constraints regarding being 4km from the point of grid connection.
Conclusion		Not progressed as site assessed as being unsuitable for the proposed development due to constraints regarding being 4km from the point of grid connection.

Appendix 4: Site Visit Images (09 March 2023)

Alternative Site ref. 4 – Land east of Naden Brook and south of Hutchinson Road,
OL11 5TX



Alternative Site ref. 5 – Land north of Clay Lane and east of Furbarn Road, OL11 5WD



**Alternative Site ref. 6 – Land south of Edenfield Road and west of Old Delph Road,
OL11 5XQ**





Alternative Site ref. 10 – Land west of Regency Court, OL11 5XD





**Appendix 5: Letter - ENW to Shaw Energi
December 2022**

Shaw-Energi Ltd
Junction Lane
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Newton le Willows
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WA12 8DN

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Email: enquiries@enwl.co.uk
Web: www.enwl.co.uk

Direct line: 07887290028
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20 December 2022

By email

Dear Graham Shaw,

SHAW-ENERGI LTD BATTERY ENERGY STORAGE SYSTEM PROPOSAL AT 132KV ELECTRICITY SUBSTATION CLAY LANE, ROCHDALE

I am writing to you on behalf Electricity North West in respect of the above-mentioned property.

Having reviewed several Battery Energy Storage System (BESS) proposals with you on our site at Clay Lane, Rochdale, I regret to inform you that we are unable to accommodate a BESS scheme on our site.

To date, we have reviewed several iterations of BESS plans and attended a site visit on 18 January 2022 to assess whether a scheme would be viable.

Due to constraints of ownership, our own property assets, and our current and future operational requirements, we are unable to find an installation solution that would enable Electricity North West to continue operations without restriction or hinderance.

Thank you for your time and interest.

Yours sincerely

Holly Bamber
Property Surveyor
Electricity North West



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